

EPA Jacket 5481-430

Vol.1

REF	APOL DATE
1	5/27/82
2	11/29/82
3	4/10/85
4	1-31-84

264-772
 REF
 1

60

26466

Labeling

RAT TERATOLOGY

655

300

660

Ruby Whifers

10/23/01 10:18 AM

To: Diane Isbell/DC/USEPA/US@EPA, Denise
Greenway/DC/USEPA/US@EPA, Glenn
Williams/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
cc: Sherri Street/DC/USEPA/US@EPA, Margaret
Rice/DC/USEPA/US@EPA, Janet Andersen/DC/USEPA/US@EPA,
Richard Keigwin/DC/USEPA/US@EPA
Subject: FOIA Request for Report Cards on naphthaleneacetic acid

Hello,

This is a follow-up to my E-mails sent previously requesting copies of the most recent reregistration status report cards for the following chemicals:

Chemical	A.I. No.
Naphthaleneacetic acid, potassium salt	56003
Naphthaleneacetic acid	56002
Naphthaleneacetic acid, sodium salt	56007
Naphthaleneacetic acid, ammonium salt	56004
Naphthaleneacetamide	56001
Naphthaleneacetic acid, ethyl ester	56008

It appears from talking to you that these records does not exist. Considering this, I will be bringing this case to closure allowing the Requestor appeal rights.

Ruby



John

04 September, 2001

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: Advisement of Quality Control Test Results of NAA Product at Bonded Warehouse

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998, (Luis Suguiyama) this is to advise EPA of quality control test results of product at a bonded warehouse (EPA Est. No. 5481-CA-03). As indicated on the attached report, all three batches from shipment number ten of 1-Naphthalene acetic acid (NAA) technical grade product have been tested and found to be in compliance with the approved Confidential Statement of Formula. The Notice of Arrival documents will be forwarded to EPA under separate cover.

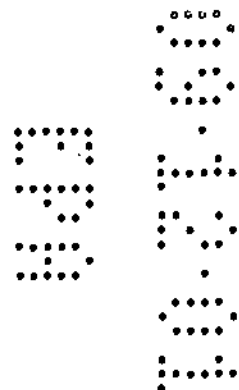
It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Jon C. Wood'.

Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)



Claimed confidential by submitter



25 July, 2001

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: Notice of Arrival NAA (NAD) Product at Bonded Warehouse

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998 (Luis Suguiyama), attached please find an approved Notice of Arrival of Pesticides and Devices (EPA Form 3540-1) for the following shipment of Alpha naphthyl acetamide (NAD) technical grade product:

<u>NAD Shipment No.</u>	<u>HBL No.</u>	<u>Entry No.</u>
7	ONE/LOS/013/2001	221-1317199-9

It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.


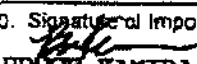
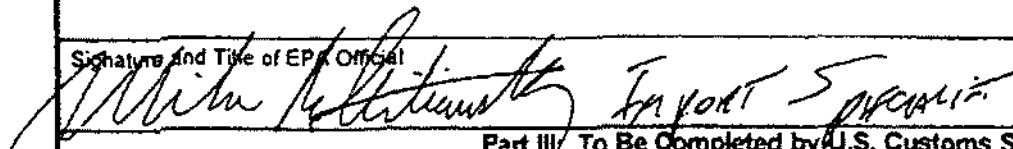
Sincerely,

Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)

010725.jcw03.naa.us

4695 MacArthur Court, Suite 1250, Newport Beach, CA 92660 • [949] 260-1212 • Fax [949] 260-1214

 United States Environmental Protection Agency Washington, DC 20460 Notice of Arrival of Pesticides and Devices		Send Completed Form to Appropriate Regional Office Listed on the Reverse of this Form.		Form Approved OMB No. 2070-0020	
Note: Read Instructions on reverse before completing form.					
Part I: To Be Completed by Importer or Agent					
1. Name and Complete Address of Broker or Agent JAMES J. BOYLE & CO. CA 91754 2525 CORPORATE PLACE #100, MONTEREY PARK			2. Name and Complete Address of Importer or Consignee AMVAC CHEMICAL CORPORATION CA 90023 4100 EAST WASHINGTON BLVD. LOS ANGELES		
<input checked="" type="checkbox"/> Return Form to this Address			<input type="checkbox"/> Return Form to this Address		
3. Name and Address of Shipper M/S SABARI CHEMICALS PVT. LTD. A2/235, G.I.D.C. ESTRIES NANDESARI 391 340, DIST. BARODA			4. EPA Registration Number 5481-431		5. EPA Producer Establishment No. 71758-IND-001
			6. Brand name of Product N/A		
7. Major Active Ingredients and Percentage of Each ALPHA NAPHTHYL ACETAMIDE (TECH) (ALPHA NAPHTHALENE ACETAMIDE)					
8. Unit Size 100 KGS.	9. Quantity 20 DRUMS	10. Total Net Weight 2,000 KGS.	11. Country of Origin MUMBAI, INDIA		
12. Port of Entry (2704) LOS ANGELES			13. Carrier HANLIN LONDON BOY #35		
14. Entry Number 221-1317199-9		15. Entry Date 6/21/01		16. I assert that information constituting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4, 5, 6, 7 are not entitled to CBI treatment—see Instructions)	
17. Location of Goods for Examination after Importation Y292 ST. GEORGE WAREHOUSE					
18. Remarks PRODUCT IS FOR REFORMULATION INTO PRODUCTS INTENDED AS GROWTH REGULATOR ON ORNAMENTALS APPLES, CHERRIES, CITRUS, OLIVES, PEARS AND QUINCES					
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
19. Printed Name of Importer or Agent NUSSEO IWAI AMERICAN CORP. C/O JAMES J. BOYLE & CO.		Telephone Number 323-263-8100		20. Signature of Importer or Agent  BRUCE KAMIDA/ATTY-IN-FACT	
				Date Signed 6/18/01	
Part II: To Be Completed by U.S. Environmental Protection Agency					
Action to be taken by U.S. Customs Service					
<input checked="" type="checkbox"/> Release Shipment <input type="checkbox"/> Detain for Inspection <input type="checkbox"/> Release shipment to consignee under bond. Shipment must be held intact pending inspection.					
<input type="checkbox"/> Other (Specify)					
Remarks					
Signature and Title of EPA Official  Import Specialist					Date 6-21-01
Part III: To Be Completed by U.S. Customs Service					
The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted. The shipment was handled as instructed by EPA in Part I. Any deviations should be brought to the attention of EPA before releasing shipment and should also be noted in "Remarks."					
Remarks					
Signature of District Director of Customs					Date



26 July, 2001

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: Advisement of Arrival of NAA Product at Bonded Warehouse

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998 (Luis Suguiyama), this is to advise EPA of the arrival of 1-Napthalene acetic acid (NAA) technical grade product at the following bonded warehouse:

AMVAC Chemical Corporation
18924 S. Laurel Park Rd.
Rancho Dominguez, CA 90220
EPA Est. No. 5481-CA-003

Attached you will find the shipment's Bill of Lading as well as summary details associated with all NAA/NAD product shipments received at the bonded warehouse to date, including those previously communicated to EPA in my letters of December 22, 1998, January 15, 1999, August 15, 2000, September 25, 2000, and July 25, 2001. Following the pending analysis of the batches to determine suitability for importation, the analytical results and Notice of Arrival documents will be forwarded to EPA as required.

It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads 'Jon C. Wood'.

Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)

010726.jcw01.naa.us



25 July, 2001

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

**Subject: Advisement of Arrival and Quality Control Test Results of NAA (NAD)
Product at Bonded Warehouse**

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998 (Luis Suguiyama), this is to advise EPA of the arrival and quality control test results of Alpha naphthyl acetamide (NAD) technical grade product at the following bonded warehouse:

AMVAC Chemical Corporation
18924 S. Laurel Park Rd.
Rancho Dominguez, CA 90220
EPA Est. No. 5481-CA-003

Attached you will find the shipment's Bill of Lading as well as summary details associated with all NAA/NAD product shipments received at the bonded warehouse to date, including those previously communicated to EPA in my letters of December 22, 1998, January 15, 1999, August 15, 2000, and September 25, 2000.

In addition, as indicated on the attached quality control test report, all four batches from shipment seven of NAD have been tested and found to be in compliance with the approved Confidential Statement of Formula. The Notice of Arrival documents are being forwarded to EPA under separate cover.

It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,

Jon C. Wood
Regulatory Manager


cc: Pamela Cooper (EPA / Region IX)


010725.jcw01.naa.us

4695 MacArthur Court, Suite 1250, Newport Beach, CA 92660 • (949) 260-1212 • Fax (949) 260-1214

Pages 14-18 Commercial/financial information may be entitled to confidential treatment

Claimed confidential by submitter


 Cynthia Giles-Parker
10/25/99 02:07 PM

To: Denise Greenway/DC/USEPA/US@EPA
cc: Luis Suguiyama/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
Subject: Re: AMVAC 

Denise,

I believe that it is appropriate to send the reports directly to BPPD. RD was listed as the contact at that time because of the uncertainty about when the chemical would be transferred and who would be the contact. RD is not actively doing anything with this chemical since the transfer to BPPD.

Denise Greenway

 Denise Greenway
10/25/99 01:59 PM

To: Luis Suguiyama/DC/USEPA/US@EPA, Cynthia Giles-Parker/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
cc:
Subject: AMVAC

Jon Wood has pointed out that he is sending the NAA QA/QC reports required by EPA as part of the "fitness" to hold a pesticide registration agreement to RD. Is it allowed under that agreement for those reports to be sent directly to BPPD now, since the ai has been transferred to us from RD? It would seem more efficient, and spare John from hand-delivering them (although I do enjoy his visits!). I did not want to ask Mr. Wood to send them to BPPD in case that would somehow violate the terms of your hard-won agreement. Should he continue directing them to RD, or start sending them here?

Thanks for your help!



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

FEB 18 2000

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Transfer of the Active Ingredient 1-Naphthaleneacetic Acid, and its Salts and Esters, from the Biopesticides and Pollution Prevention Division to the Registration Division and the Special Review and Reregistration Division

FROM: Janet L. Andersen, Director
Biopesticides and Pollution Prevention Division (7511C)

TO: James Jones, Director
Registration Division (7505C)

Lois Rossi, Director
Special Review and Reregistration Division (7508C)

and

Richard Schmitt, Director
Information Resources and Services Division (7502C)

In January of 1999, the Biopesticides and Pollution Prevention Division (BPPD) accepted responsibility for 1-naphthaleneacetic acid (NAA) and its salts and esters. BPPD agreed to take the registration work and the development of the RED because we all believed these active ingredients would be similar to the other plant growth regulators in BPPD purview. However, as BPPD initiated activities for the RED, we determined that a positive oncogenicity study (preliminary decision) exists for 1-naphthaleneacetic acid, sodium salt (PC code 056007). Unlike other plant regulators managed by BPPD, NAA active ingredients cannot be classified as biochemicals because they are not naturally occurring and they have toxic endpoints inappropriate for our review. We believe NAA will need to go through the HED cancer review process to be properly evaluated. For these reasons, the transfer of the NAA active ingredients from BPPD to RD and SRRD was recommended by Acting Deputy Office Director, Susie Hazen.

2/23/00

To help facilitate this transition, we have provided a listing of the active ingredients and their PC codes. All of the jackets for NAA products have been returned to the file room. We have prepared packages for RD to assist the PM taking over the regulatory actions and for SRRD to assist the CRM taking over the RED action. Denise Greenway (308-8263) is preparing a list of pending actions and is willing to assist the PM to understand the status and issues regarding the pending actions. Dick King (308-8052) will assist the CRM and Roger Gardner (308-8268) will be glad to help the HED scientists understand what has been reviewed to date and what has been learned from that material.

In addition, BPPD requests that IRSD change the PPIS/REFS and PRATs data bases as soon as possible to reflect this transfer of NAA active ingredients and the associated products and pending products.

You may wish to have your Branch Chiefs contact Sheryl Reilly, Acting Branch Chief for the Biochemical Pesticides Branch at 308-8269.

Attachment

ATTACHMENT

Listing of Active Ingredients:

PC code 056001	1-Naphthaleneacetamide
PC code 056002	1-Naphthaleneacetic acid
PC code 056003	Potassium 1-naphthaleneacetate
PC code 056004	Ammonium 1-naphthaleneacetate
PC code 056005, no active products	2-Methyl-1-naphthaleneacetic acid
PC code 056006, no active products	2-Methyl-1-naphthaleneacetamide
PC code 056007	Sodium 1-naphthaleneacetate
PC code 056008	Ethyl 1-naphthaleneacetate
PC code 589300, no active products	1-Naphthaleneacetic acid, methyl ester

For the RD weekly.
Ca. Feb./Mar., 2000

Naphthaleneacetic Acid and Salts (NAA) to return to RD an SRRD

A meeting was held between RD and BPPD on March 15 to discuss the details of an immediate return of the registration aspects of NAA to RD by BPPD. It was also confirmed that reregistration aspects of NAA will be given to SRRD. Transfer of NAA to BPPD occurred about a year ago because NAA is a close analog of naturally occurring plant hormones (auxins). However, BPPD has since decided that NAA appears to have toxicology problems and so is not suitable for their type of processing. BPPD is completing a number of NAA Actions that they have in-house and have already initiated work on. Those Actions on which work has not yet begun have been retrieved and work initiated on them by Fungicide Branch.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

APR 16 2001

Jon Wood
Amvac Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, California 92660

Subject: Technical Naphthalene Acetic Acid
EPA Registration Number 5481-430
Amended Basic Confidential Statement of Formula (CSF)
dated January 25, 2001; Alternate CSF dated May
25, 2000; and amended label dated April 3, 2001

Dear Mr. Wood,

The Basic CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable and supersedes all previously accepted Basic formulas. A copy of the Basic CSF, dated January 25, 2001, has been placed in our file for the subject product. The Alternate CSF referred to above, submitted in connection with registration under FIFRA, as amended, is also acceptable. A copy of the subject Alternate CSF, dated May 25, 2000, has been placed in our file for the subject product. This CSF was rejected in a Technical Review Branch (TRB) review dated August 9, 2000 but the additional information concerning it that has since been received has been sufficient to make it acceptable. A copy of the most recent TRB review is attached.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment.

If you have any questions about this letter, please contact
John Bazuin at (703)305-7381.

Sincerely yours,

/s/

Cynthia Giles-Parker
Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Attachment: TRB/Product Chemistry review
Label stamped "Accepted"

Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
EMERGENCY TELEPHONE NUMBERS	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.	

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permits and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. • LOS ANGELES, CA 90023 • U.S.A.

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneacetamide and only for those uses which are duly registered with the U.S. EPA. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conform to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

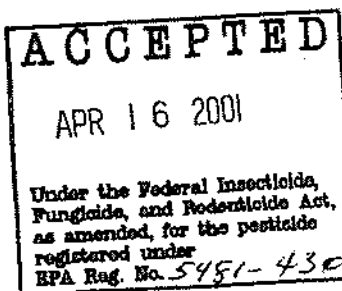
AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

Transportation: CHEMTREC 1-800-424-9300

Other: AMVAC 1-323-264-3910

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822
www.amvac-chemical.com



Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
EMERGENCY TELEPHONE NUMBERS	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.	

[added]

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permits and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. • LOS ANGELES, CA 90023 • U.S.A.

430-010312 doc

Page 1 of 2

changed from "1"

Compared to the label faxed on 3/21/01. j

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneacetamide and only for those uses which are duly registered with the U.S. EPA. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

"Do not contaminate water, food or feed by storage or disposal." deleted

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conform to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

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BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

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FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

Transportation: CHEMTREC 1-800-424-9300

Other: AMVAC 1-323-264-3910

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822
www.amvac-chemical.com



FACSIMILE TRANSMISSION
(Cover Page)

To: John Bazuin
U.S. EPA

Date: 03 April, 2001

Fax: (703) 308-1825

Phone: (703) 305-7381

From: Brenda K. Balsz
Regulatory Affairs Specialist

Fax: (949) 476-9303

Phone: (949) 260-1212

Subject: Label Amendment Replacement Labeling:
Technical Naphthalene Acetic Acid (EPA Reg. No. 5481-430)

Dear Mr. Bazuin:

Please find attached replacement labeling (Ref. 430-010312r2) for the above subject label amendment currently being reviewed at EPA. Note that this labeling supersedes labeling submitted to the agency on 14-Mar-01 (Ref. 430-010312r1). This labeling reflects changes as per your discussion with Jon Wood.

If you have any questions, please do not hesitate to contact me at the above phone number.

Regards,

Brenda Balsz

TOTAL NUMBER OF PAGES (including cover page): 3

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4695 MacArthur Court, Suite 1250, Newport Beach, CA 92660 • (949) 260-1212 • Fax (949) 260-1214

Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID

If in eyes:	<ul style="list-style-type: none"> Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none"> Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

EMERGENCY TELEPHONE NUMBERS

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permits and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. • LOS ANGELES, CA 90023 • U.S.A.

INSTRUCTIONS FOR FORMULATION

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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which YOU have handled or will handle other agricultural chemicals unless thoroughly cleaned. **PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

LIMITED WARRANTY AND DISCLAIMER

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Other: AMVAC 1-323-264-3910

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4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822
www.amvac-chemical.com



14 March, 2001

Ms. Cynthia Giles-Parker, PM-22
Document Processing Desk
Office of Pesticide Programs (H7505C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Subject: Label Amendment to Comply with Amended CSFs and PR Notice 2001-1
1-Naphthaleneacetic Acid (EPA Reg. No. 5481-219)
Technical Naphthaleneacetic Acid (EPA Reg. No. [REDACTED])

Dear Ms. Giles-Parker:

This is submitted to request approval of revised labeling for the subject technical grade NAA products. These labels have been modified to match recent changes in the Confidential Statement of Formula (change to 95.5% a.i.), and to update First Aid Statements in accordance with PR Notice 2001-1.

In support of this request, please find the following documents enclosed for each product:

1. Registration Application (EPA form 8570-1)
2. Five copies of proposed product labeling (Ref. 010312r1). One copy has been highlighted to indicate changes.

As AMVAC needs to generate current labeling as soon as possible in order to accommodate production schedules, any effort to expedite this request would be greatly appreciated. If you need additional information, please don't hesitate to contact me at 949-260-1212 or 323-526-2388 (voicemail) or jonwood@earthlink.net. Thank you for your consideration.

Best regards,

Jon C. Wood
Regulatory Manager

010314.jcw02.naa.us

4695 MacArthur Court, Suite 1250, Newport Beach, CA 92660 • (949) 260-1212 • Fax (949) 260-1214

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-05



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5481-430	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Technical Naphthaleneacetic Acid	PM# 22	
5. Name and Address of Applicant (Include Zip Code) Amvac Chemical Corporation 4685 MacArthur Court, Suite 1250 Newport Beach, CA 92660 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Label Amendment as follows:

- Update First Aid per PR Notice 2001-1
- Update Ingredient Statement to comply with CSF (95.5% a.i.)
- Update Company Information

Section - III

2. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) <u>Fiber Drum</u>
* Certification must be submitted		If "Yes" Unit Packaging wt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lb. bag; 100 lb. drum	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued		<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jon C. Wood	Title Regulatory Manager	Telephone No. (Include Area Code) 949-260-1212 // 323-526-2388 VM
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
2. Signature <i>Jon C. Wood</i>	3. Title Regulatory Manager	
4. Typed Name Jon C. Wood	5. Date 14-Mar-01	

Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID	
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EMERGENCY TELEPHONE NUMBERS	
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Environmental Hazards

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EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. ♦ LOS ANGELES, CA 90023 ♦ U.S.A.

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INERT INGREDIENTS: 4.5%

Total 100.0%

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EMERGENCY TELEPHONE NUMBERS	
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Environmental Hazards

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EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. • LOS ANGELES, CA 90023 • U.S.A.

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1-888-462-6822
www.amvac-chemical.com

Fax

To: <u>JOHN BAZUIN</u>	From: <u>Jon Wood</u>
Fax: <u>103-308-1825</u>	Pages: <u>8 w/cover</u>
Phone: <u>103-305-7381</u>	Date: <u>21-Mar-01</u>
Re:	CC:
<input type="checkbox"/> Urgent <input checked="" type="checkbox"/> For Review <input type="checkbox"/> Please Comment <input type="checkbox"/> Please Reply <input type="checkbox"/> Please Recycle	

As discussed This was mailed
on 14-Mar-01 . . .

Thanks!

Jon

Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid

INERT INGREDIENTS:

Total

100.0%

changed From "95.0%"

changed From "5.0%"

KEEP OUT OF REACH OF CHILDREN

DANGER

"CORROSIVE CAUSES IRREVERSIBLE EYE DAMAGE." deleted
"WEAR SAFETY GOGGLES WHEN HANDLING." deleted
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

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changed From
"to explicado"

changed From "STATEMENT OF
PRACTICAL TREATMENT"

FIRST AID	
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If on skin or clothing	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
EMERGENCY TELEPHONE NUMBERS	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-204-3910.	

Extensively revised.
per PR Notice 2001-1, except that "inhalation" is not here and should be.

Environmental Hazards

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EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. • LOS ANGELES, CA • U.S.A.

changed From "900238"

changed From "50 Pounds"

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneaceticamide and only for those uses which are duly registered with the U.S. EPA. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

"supplemental" deleted
"formulation into a plant growth regulator is prohibited for use on pineapples."

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

← "C5481-430.PM4/10-15-93" deleted

LIMITED WARRANTY

The manufacturer warrants (a) that this product conforms to the chemical description on the label; (b) that the product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. There have not been trials on all varieties of food crops and plants, in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REFUND OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL THE MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

Transportation: CHEMTREC..... 1-800-424-9300

Other: AMVAC..... 1-800-228-5635

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-800-462-6622
www.amvac-chemical.com

[Added]

changed from "2-MEDICAL: H.I.S.
1-800-228-5635 Ext. 169"



14 March, 2001

Ms. Cynthia Giles-Parker, PM-22
Document Processing Desk
Office of Pesticide Programs (H7505C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

**Subject: Label Amendment to Comply with Amended CSFs and PR Notice 2001-1
1-Naphthaleneacetic Acid (EPA Reg. No. 5481-219)
Technical Naphthaleneacetic Acid (EPA Reg. No. [REDACTED])**

Dear Ms. Giles-Parker:

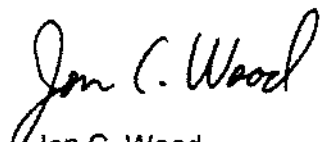
This is submitted to request approval of revised labeling for the subject technical grade NAA products. These labels have been modified to match recent changes in the Confidential Statement of Formula (change to 95.5% a.i.), and to update First Aid Statements in accordance with PR Notice 2001-1.

In support of this request, please find the following documents enclosed for each product:

1. Registration Application (EPA form 8570-1)
2. Five copies of proposed product labeling (Ref. 010312r1). One copy has been highlighted to indicate changes.

As AMVAC needs to generate current labeling as soon as possible in order to accommodate production schedules, any effort to expedite this request would be greatly appreciated. If you need additional information, please don't hesitate to contact me at 949-260-1212 or 323-526-2388 (voicemail) or jonwood@earthlink.net. Thank you for your consideration.

Best regards,


Jon C. Wood
Regulatory Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

284497

Application for Pesticide - Section I

1. Company/Product Number 5481-430	2. EPA Product Manager Cynthia Glies-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Technical Naphthaleneacetic Acid	PM# 22	
5. Name and Address of Applicant (Include Zip Code) Amvac Chemical Corporation 4695 MacArthur Court, Suite 1250 Newport Beach, CA 92660 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Label Amendment as follows:

- Update First Aid per PR Notice 200 t-t
- Update Ingredient Statement to comply with CSF (95.5% a.i.)
- Update Company Information

Section - III

2. Material This Product Will Be Packaged in:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Fiber Drum
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lb. bag; 100 lb. drum	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued		<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Jon C. Wood	Title Regulatory Manager	Telephone No. (include Area Code) 949-260-1212 // 323-526-2388 VM	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			8. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Manager		
4. Typed Name Jon C. Wood	5. Date 14-Mar-01		



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

284497

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM#	
5. Name and Address of Applicant (Include ZIP Code) <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)II, my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name		Title		Telephone No. (Include Area Code)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped)
2. Signature		3. Title			
4. Typed Name		5. Date			

45

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.6 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.

Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.095.5%

INERT INGREDIENTS: 5.04.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID

If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.

EMERGENCY TELEPHONE NUMBERS

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.

Statement of Practical Treatment

In case of eye contact, flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permits and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. ♦ LOS ANGELES, CA 90023 ♦ U.S.A.

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Nephthaleneacetamide and only for those uses which are duly registered with the U.S. EPA. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which YOU have handled or will handle other agricultural chemicals unless thoroughly cleaned. **PESTICIDE DISPOSAL:** Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conform to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

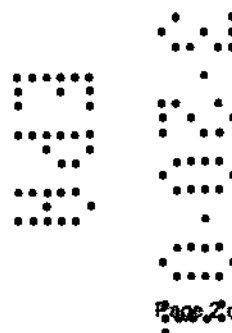
AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

Transportation: CHEMTREC 1-800-424-9300

Other: AMVAC..... 1-323-264-3910

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822
www.amvac-chemical.com



IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following LIMITED WARRANTY: AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions. There are no express warranties other than those set forth herein. Amvac neither makes nor intends, nor does it authorize any agent or representative to make, any other warranty, express or implied. Amvac expressly excludes and disclaims all implied warranties of merchantability, fitness for particular purpose, or any other warranty of quality or performance.

This warranty does not extend to, and the user shall be solely responsible for, any loss or damage which results from the use of this product in any manner which is inconsistent with this label's directions, warnings or cautions.

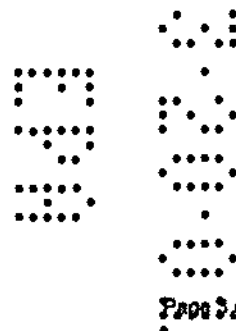
User's exclusive remedy and Amvac's or seller's exclusive liability for any claim, loss, damage, or injury resulting from the use or handling of this product, whether or not based in contract, negligence, strict liability in tort, or otherwise, shall be limited, at Amvac's option, to replacement of, or repayment of the purchase price for, the quantity of product with respect to which damages are claimed. In no event shall Amvac or seller be liable for special, indirect, or consequential damages resulting from the use or handling of this product.

This is a specimen label and intended for use only as a guide in providing general information regarding the directions, warnings and cautions associated with the use of this product. AMVAC Chemical is not responsible for the accuracy of the information contained herein as labels are subject to change. Always carefully read and follow the label instructions on the product container before using.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY

Transportation: Chemtrec 1-800-424-9300

Medical: Hazard Information Services (H.I.S.) 1-800-228-5635, Ext. 169



Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%
Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID	
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
EMERGENCY TELEPHONE NUMBERS	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.	

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPOES) permits and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

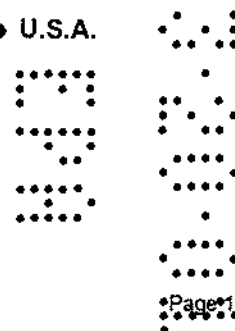
EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. ♦ LOS ANGELES, CA 90023 ♦ U.S.A.



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STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which YOU have handled or will handle other agricultural chemicals unless thoroughly cleaned. **PESTICIDE DISPOSAL:** Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants (a) that this product conform to the chemical description on the label; (b) that this product is reasonably fit for the purposes set forth in the directions for use, subject to the inherent risks referred to herein, when it is used in accordance with such directions; and (c) that the directions, warnings, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and to plants and residues on food crops, and upon reports of field experience. Tests have not been made on all varieties of food crops and plants, or in all states or under all conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. THE MANUFACTURER NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE, TO MAKE ANY OTHER WARRANTIES, EXPRESS OR IMPLIED, AND IT EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY OF FITNESS FOR A PARTICULAR PURPOSE, OR ANY WARRANTY OF QUALITY OR PERFORMANCE. THIS WARRANTY DOES NOT EXTEND TO, AND THE BUYER SHALL BE SOLELY RESPONSIBLE FOR, ANY AND ALL LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THE LABEL DIRECTIONS, WARNINGS OR CAUTIONS.

BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

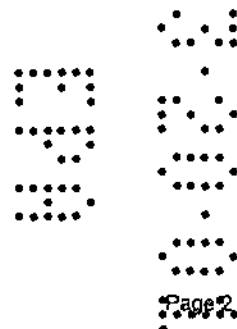
AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

Transportation: CHEMTREC 1-800-424-9300

Other: AMVAC 1-323-264-3910

AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822
www.amvac-chemical.com



Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

DANGER: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

FIRST AID	
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by the poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
EMERGENCY TELEPHONE NUMBERS	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. Questions? Call 1-323-264-3910.	

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permits and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters.

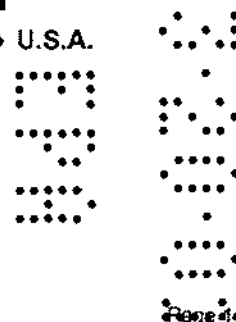
EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. ♦ LOS ANGELES, CA 90023 ♦ U.S.A.



INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneacetamide and only for those uses which are duly registered with the U.S. EPA. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. **STORAGE:** Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which YOU have handled or will handle other agricultural chemicals unless thoroughly cleaned. **PESTICIDE DISPOSAL:** Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

LIMITED WARRANTY AND DISCLAIMER

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BUYER'S EXCLUSIVE REMEDY AND MANUFACTURER'S OR SELLER'S EXCLUSIVE LIABILITY FOR ANY AND ALL CLAIMS, LOSSES, DAMAGES, OR INJURIES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT OR OTHERWISE, SHALL BE LIMITED, AT THE MANUFACTURER'S OPTION, TO REPLACEMENT OF, OR THE REPAYMENT OF THE PURCHASE PRICE FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT, SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INDIRECT OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

AMVAC offers this product, and Buyer accepts it, subject to the foregoing Limited Warranty which may be varied only by agreement in writing signed by an authorized representative of AMVAC.

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY:

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Other: AMVAC 1-323-264-3910

AMVAC Chemical Corporation
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Los Angeles, CA 90023 U.S.A.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

03/28/2001

JON C. WOOD
AMVAC CHEMICAL CORP
4695 MACARTHUR COURT, SUITE 1250
NEWPORT BEACH CA 926601706

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: TECHNICAL NAPHTHALENEACETIC ACID
COMPANY NAME: AMVAC CHEMICAL CORP
OPP IDENTIFICATION NUMBER: 284497
EPA REGISTRATION NUMBER: 5481-430
EPA RECEIPT DATE: 03/20/2001

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact C. Giles-Parker, Product Manager 22, at (703)-305-7740.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Wrice".

Front End Processing Staff
Information Services Branch
Program Management and Support Division



John

5595005

FRONT END PROCESSING APPLICATION INFORMATION CHECK LIST

PM 22

EPA COMPANT NUMBER 5481-430

EPA REGISTRATION NUMBER STATUS ACTIVE ☒ CANCELLED ☐
(FOR AMENDMENTS)

NOT IN REFS ☐

"ME-TOO" CITED PRODUCT STATUS ACTIVE ☐ CANCELLED ☐

NOT IN REFS ☐

OPP# 284497 DATE 3-23-01

AMENDMENT

APPLICATION FOR AMENDMENT

WITH DATA

WITHOUT DATA

<u>INIT.</u>	<u>DATE</u>	<u>INIT.</u>	<u>DATA</u>
FEU _____	_____	FEU <u>Jun</u>	<u>3 23 01</u>
SIG. (DATA) _____	_____	PM <u>22</u>	
PM _____			

OPP # 284497



14 March, 2001

Ms. Cynthia Giles-Parker, PM-22
Document Processing Desk
Office of Pesticide Programs (H7505C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

**Subject: Label Amendment to Comply with Amended CSFs and PR Notice 2001-1
1-Naphthaleneacetic Acid (EPA Reg. No. 5481-219)
Technical Naphthaleneacetic Acid (EPA Reg. No. 5481-430)**

Dear Ms. Giles-Parker:

This is submitted to request approval of revised labeling for the subject technical grade NAA products. These labels have been modified to match recent changes in the Confidential Statement of Formula (change to 95.5% a.i.), and to update First Aid Statements in accordance with PR Notice 2001-1.

In support of this request, please find the following documents enclosed for each product:

1. Registration Application (EPA form 8570-1)
2. Five copies of proposed product labeling (Ref. 010312r1). One copy has been highlighted to indicate changes.

As AMVAC needs to generate current labeling as soon as possible in order to accommodate production schedules, any effort to expedite this request would be greatly appreciated. If you need additional information, please don't hesitate to contact me at 949-260-1212 or 323-526-2388 (voicemail) or jonwood@earthlink.net. Thank you for your consideration.

Best regards,

A handwritten signature in cursive script that reads 'Jon C. Wood'.

Jon C. Wood
Regulatory Manager

010314.jcw02.naa.us

4695 MacArthur Court, Suite 1250, Newport Beach, CA 92660 • (949) 260-1212 • Fax (949) 260-1214

Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0090, Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

Company/Product Number 5481-430	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
Company/Product (Name) Technical Naphthaleneacetic Acid	PMN 22	
Name and Address of Applicant (Include Zip Code) Amvac Chemical Corporation 4695 MacArthur Court, Suite 1250 Newport Beach, CA 92660 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

☒ Amendment - Explain below ☐ Final printed labels in response to Agency letter dated _____

☐ Resubmission in response to Agency letter dated _____ ☐ "Me Too" Application

☐ Notification - Explain below ☐ Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Label Amendment as follows:
Update First Aid per PR Notice 2001-1
Update Ingredient Statement to comply with CSF (95.5% a.i.)
Update Company Information

Section - III

Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wt.	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wt.	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) Fiber Drum
* Certification must be submitted		No. per container	No. per container
Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lb. bag; 100 lb. drum	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued		<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Jon C. Wood	Title Regulatory Manager	Telephone No. (Include Area Code) 949-260-1212 // 323-526-2388 VM
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped)
Signature <i>Jon C. Wood</i>	3. Title Regulatory Manager	
Typed Name Jon C. Wood	5. Date 14-Mar-01	

Technical Naphthalene Acetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.5%

INERT INGREDIENTS: 4.5%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

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EMERGENCY TELEPHONE NUMBERS	
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EPA Reg. No. 5481-430

EPA Est. No. 5481-CA-1

NET WEIGHT: As Marked on Container

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. • LOS ANGELES, CA 90023 • U.S.A.

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AMVAC Chemical Corporation
4100 E. Washington Boulevard
Los Angeles, CA 90023 U.S.A.
1-888-462-6822
www.amvac-chemical.com

FACSIMILE TRANSMISSION
(Cover Page)

To: John Bazuin
U.S. EPA

Date: 14 March, 2001

Fax: (703) 308-1825

Phone: (703) 305-7381

From: Jon Wood
Regulatory Manager

Fax: (949) 476-9303

Phone: (949) 260-1212

Subject: Label Amendment to Comply with Amended CSFs and PR Notice 2001-1
1-Naphthaleneacetic Acid (EPA Reg. No. 5481-219)
Technical Naphthaleneacetic Acid (EPA Reg. No. 5481-430)

Hi John:

The attached amendment as discussed was mailed today via Priority Mail

TOTAL NUMBER OF PAGES (including cover page): 8

PESTICIDE REGISTRATION ACTION TRACKING SYSTEM (PRATS) CODING FORM

BAR CODE: 5595005 ID NUMBER: 5481-430 ACTION CODE: 300

PM: 22 REVIEWER: Bazuin DUE DATE: 6 / 18 / 01

DATE ON APPLICATION: 3 / 14 / 01

EPA RECEIVED DATE: 3 / 20 / 01

PM RECEIVED DATE: 3 / 30 / 01

APPLICANT: Amvac Chemical Corp.; Jon Wood

CHEM CODE (1): 056002 CHEM: NAA

CHEM CODE (2): _____ CHEM: _____

DESCRIPTOR: Correct Ingredient Statement; update label

DATA REVIEWS:

HED: RCAB _____ TB _____ RCB _____ DRES _____

OREB _____

EFED: IO _____ EEB _____ EFGWB _____ ERCB _____

BEAD: ACB _____ BAB _____ EAB _____

RSB: PCRS _____ PRS _____ PCS _____

PM Team: Carl _____ Paul _____ Vern _____ Bill _____

FINAL ACTION: RESPONSE CODE: _____ RESPONSE DATE: ____/____/____

75-DAY RESPONSE: YES _____ NO _____ MOS: (1) CITE ALL

CRP: YES _____ NO _____ (4) NOT APPLICABLE

RESTRICTED USE: YES _____ NO _____ (8) SELECTIVE

EXCLUSIVE USE: YES _____ NO _____

MANUFACTURING USE: YES _____ NO _____

CONDITIONAL REGISTRATION/UNCONDITIONAL REGISTRATION

NOTES: _____

DATE OUT: 01/MAR/2001

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: A TECHNICAL GRADE [TGAI]

DP BARCODE No. D272325 **RECEIVED DATE:** 25/JAN/2001 **REG./File Symbol No.:** 5481-430

PRODUCT: Technical Naphthaleneacetic acid, 95.5% NAA **MRID** several blow-backs

COMPANY NAME: Amvac Chemical Corporation **Action Code:** 345

FROM: Sami Malak, Chemist *S. Malak*
Technical Review Branch/RD (7505C)

TO: 22 Cynthia Giles-Parker/John Bazuin
Fungicide Branch/RD (7505C)

INTRODUCTION:

In a letter dated 25/JAN/2001, the applicant responded to EPA's letter of 24/AUG/2000 reflecting our previous memorandum and submitted additional product chemistry data and a revised basic formulation, CSF dated 25/JAN/2001 (DP #267490, S. Malak, 09/AUG/2000).

FINDINGS:

1. In our previous memorandum (DP #267483, S. Malak, 09/AUG/2000), a request to approve an alternate formulation, CSF dated 25/MAY/2000, was denied because it was produced by mixing two active ingredients of 1-Naphthaleneacetic acid (1-NAA), [REDACTED], an alternate formulation CSF dated 23/APR/1996, Reg. No. 5481-430 and a second from [REDACTED] an alternate formulation CSF dated 23/APR/1996, Reg. No. 5481-430. The blending was intended to achieve the claimed nominal concentration of 95% 1-NAA.
2. In a subsequent meeting with the applicant, it was explained that the submitted alternate formulation, CSF dated 25/MAY/2000, is different in composition from that of the current basic formulation. The applicant was then advised to upgrade the current basic formulation in a manner similar to that of the alternate formulation, i.e., by mixing the [REDACTED] registered sources from [REDACTED] and [REDACTED]. Once a revised basic formulation is accepted, then similar alternate formulations can also be accepted.
- 3a. The proposed basic formulation, CSF dated 25/JAN/2001, is produced by the applicant in Los Angeles, California. This formulation is substantially similar in composition to each of the [REDACTED] sources from [REDACTED] and [REDACTED] (refer to Finding 1). No new impurities were formed during the mixing process and no changes in the nominal concentrations of the ingredients or the upper limits for the impurities.
- 3b. The previously rejected alternate formulation, CSF dated 25/MAY/2000, is identical in composition to the proposed new basic formulation and, therefore, is acceptable.

4. This memorandum covered the most recent MRIDs, all of which were reviewed in connection with our previous memorandum (DP #267490, S. Malak, 09/AUG/2000). Blow backs dated to before 1995, included with this submission, were previously submitted and reviewed in connection with registration of subject product. Only selective information was obtained from older blow backs, identified by the MRID number in this memorandum.
5. Adequate analytical methods are available for enforcement. The methods were previously submitted and reviewed in connection with registration of technical 1-Naphthaleneacetic acid, Reg. No. 5481-219. The method for 1-NAA, included in MRID #438777-02 is entitled "Determination of 1-and 2-Naphthaleneacetic acid by HPLC, Internal Standard Method (4-CPA)." The procedure is applicable for the determination of NAA and NAA.Na salt in both technical and formulated products. A second method was also included for NAA's impurities entitled "Determination of 1-Naphthaleneacetic acid Impurities by HPLC External Standard Method." The procedure is applicable for the determination of impurities in 1-NAA & 1-NAA.Na salt in technical products. Sample calculation and chromatograms were included with this submission.
6. The label claim nominal concentration of 95% is inconsistent with that on product's basic and alternate formulations CSFs dated 25/JAN/2001 & 25/MAY/2000, respectively. In the submitted letter of 25/JAN/2001, the applicant indicated that a revised Label is forthcoming to correct the nominal concentration to 95.5%

CONCLUSIONS:

1. We have no objections for approval of the proposed new basic, CSF dated 25/JAN/2001. It should supersede the current basic formulation.
2. We have no objections for approval of the previously rejected alternate formulation, CSF dated 25/MAY/2000. It is identical in composition to the new basic formulation.
3. A revised label is needed as per Finding 6 above.

REVIEW OF PRODUCT CHEMISTRY DATA:

1. A statement of data confidentiality dated 28/FEB/2000 was included with this submission claiming confidentiality of some of the submitted data the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C). Review of CBI data is to be found in Appendix A.
2. A GLP statement dated 28/FEB/2000 was included with this submission to the effect that some of the submitted studies were conducted in compliance with GLP requirements of 40CFR§160.

DATA SUBMITTED

MRID #451430-01C The submitted study entitled: "Product Identity and Composition of Technical Naphthaleneacetic acid, Data Requirements of OPPTS Test Guidelines 830.1550", was authored by Gary Barden; Performed by AMVAC Chemical Corporation of City of Commerce, California; Completed on 25/FEB/2000 (7 pages).

MRID #451430-02C The submitted study entitled: "Materials Used for Production of Technical Naphthaleneacetic acid, Data Requirements of OPPT Test Guidelines 830.1600", was authored by Gary Barden; Performed by AMVAC Chemical Corporation of City of Commerce, California; Completed on 25/FEB/2000 (6 pages).

MRID #451430-03C The submitted study entitled: "Production Process for Technical Naphthaleneacetic acid, Data Requirements of OPPT Test Guidelines 830.1620", was authored by Gary Barden; Performed by AMVAC Chemical Corporation of City of Commerce, California; Completed on 25/FEB/2000 (6 pages).

MRID #451430-04C The submitted study entitled: "Formation of Impurities in Technical Naphthaleneacetic acid, Data Requirements of OPPT Test Guidelines 830.1670", was authored by Gary Barden; Performed by AMVAC Chemical Corporation of City of Commerce, California; Completed on 25/FEB/2000 (6 pages).

MRID #451430-05C The submitted study entitled: "Certification of Limits for Technical Naphthaleneacetic acid, Data Requirements of OPPT Test Guidelines 830.1750", was authored by Gary Barden; Performed by AMVAC Chemical Corporation of Los Angeles, California; Completed on 25/FEB/2000 (6 pages).

Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)

830-1550 Product Identity and Composition

Product Name: 1-Naphthaleneacetic acid

Chemical Name: 2-(1-Naphthyl)acetic acid

Common Name: 2-(1-Naphthyl)acetic acid, α -Naphthaleneacetic acid, NAA

CAS Number: 86-87-3

Structural; Formula: Reefer to MRID #451430-01C

Empirical Formula: $C_{12}H_{10}O_2$

Molecular Weight: 186.21

Product's Composition: Refer to Product's CSF, a basic formulation dated 25/JAN/2001.

830-1600 Description of Materials Used to Produce the Product:

Refer to Confidential appendix A.

830-1620 Description of Production Process:

Refer to Confidential appendix A.

830-1670 Discussion of Formation of Impurities:

Refer to Confidential appendix A.

830-1700 Preliminary Analysis:

Refer to Confidential appendix A.

830-1750 Certified Limits:

Refer to Confidential appendix A.

830-1800 Enforcement Analytical Method:

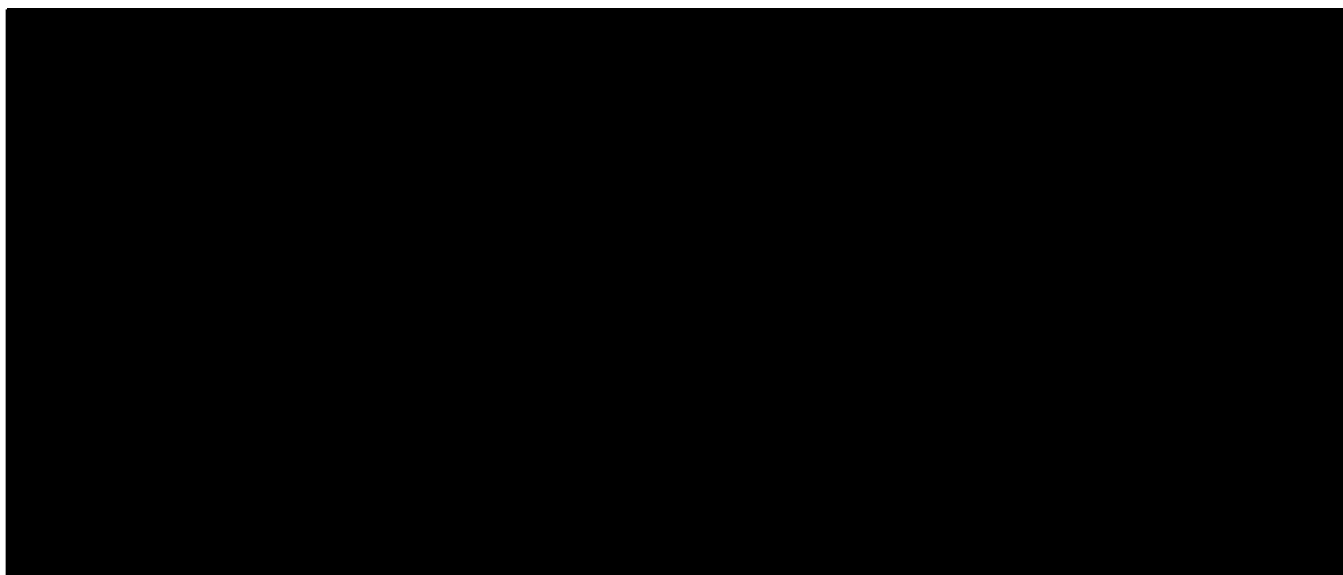
Adequate analytical methods are available for enforcement. The method were previously submitted and reviewed in connection with registration of technical 1-Naphthaleneacetic acid, Reg. No. 5481-219. The method for 1-NAA, included in MRID #438777-02 is entitled "Determination of 1-and 2-Naphthaleneacetic acid by HPLC, Internal Standard Method (4-CPA)." The procedure is applicable for the determination of NAA and NAA.Na salt in both technical and formulated products. A second method was also included for NAA's impurities entitled "Determination of 1-Naphthaleneacetic acid Impurities by HPLC External Standard Method." The procedure is applicable for the determination of impurities in 1-NAA & 1-NAA.Na slat in technical products. Sample calculation and chomtaograms were included with this submission.

Confidential Appendix A

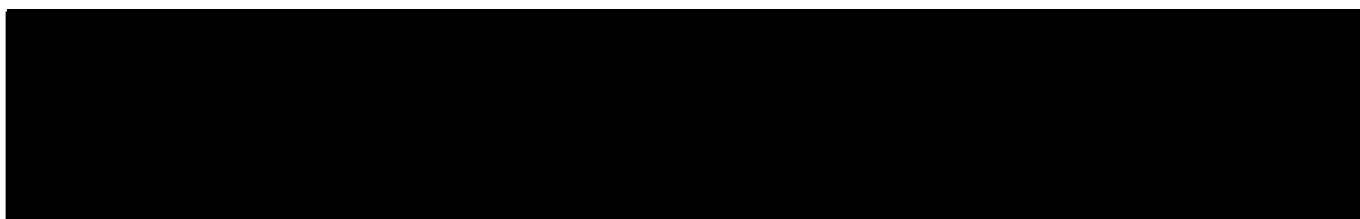
830-1600 Description of Materials Used to Produce the Product:

The subject product was produced by blending two registered technical grade of active ingredients of 1-NAA, both of the same Reg. No. as subject product, 5481-430.

830-1620 Description of Production Process:

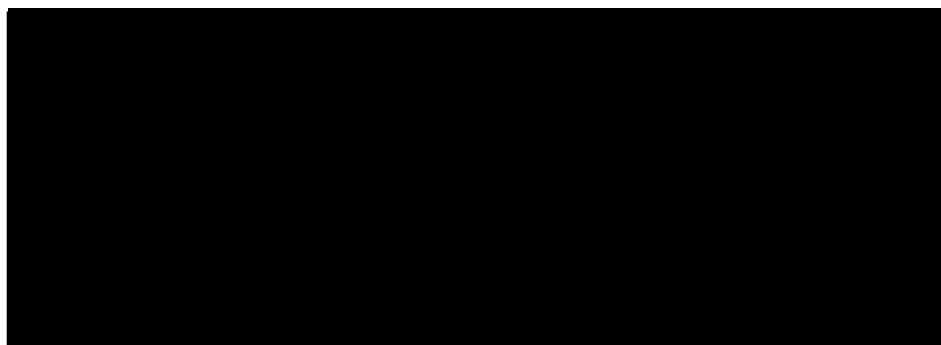


830-1670 Discussion of Formation of Impurities:



Impurities Identified in Technical 1-Naphthaleneacetic acid:

<u>Impurity</u>	<u>Percent Nominal Concentration</u>
-----------------	--------------------------------------



Plus one ingredient that cannot be fully characterized. It is an [REDACTED]

830-1700 Preliminary Analysis: MRID #438777-02

Five Batches of the ongoing production of technical grade 1-Naphthaleneacetic acid (1-MAA) as made by [REDACTED], were analyzed using the analytical methods described in this memorandum. Ingredients detected at $\geq 0.1\%$ w/w were reported. The following is the average percent of each in the five batches:

<u>Ingredient</u>	<u>Average Wt. %</u>
-------------------	----------------------

1-Naphthaleneacetic acid (1-NAA).....	96.24
---------------------------------------	-------

830-1750 Certified Limits:

The applicant reported the same ingredients at percentages and low/upper limits as those reported on product's CSF. These are:

<u>Component</u>	<u>Limits, weight %</u>
------------------	-------------------------

1-Naphthaleneacetic acid (1-NAA).....	95.00 minimum
---------------------------------------	---------------

DP BARCODE: D272325

#11566

CASE: 003342
SUBMISSION: S591798

DATA PACKAGE RECORD
BEAN SHEET

DATE: 01/31/01
Page 1 of 2

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 345 TECH-FORMULA CHANGE AMND
RANKING : 5 POINTS ()
CHEMICALS: 056002 NAA

95.0000%

ID#: [REDACTED] TECHNICAL NAPHTHALENEACETIC ACID
COMPANY: 005481 AMVAC CHEMICAL CORP
PRODUCT MANAGER: 22 CYNTHIA GILES-PARKER 703-305-7740 ROOM: CM2 249
PM TEAM REVIEWER: JOHN BAZUIN 703-305-7381 ROOM: CM2 267
RECEIVED DATE: 01/25/01 DUE OUT DATE: 04/25/01

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 272325 EXPEDITE: Y DATE SENT: 01/31/01 DATE RET.: / /

CHEMICAL: 056002 NAA

DP TYPE: 001 Submission Related Data Package

CSF: Y

LABEL: Y

ASSIGNED TO DATE IN DATE OUT ADMIN DUE DATE: 3-23-01
DIV : RD / / / / 03/17/01
BRAN: TRB / / / /
SECT: CHEM / / / /
REVR : / / / /
CONTR: / / / /
NEGOT DATE: / /
PROJ DATE: / /

* * * DATA REVIEW INSTRUCTIONS * * *

[Jon Wood from Amvac was here last week to discuss this submission, which Sami Malak had turned down once before. We met with Sami and worked out a way for Amvac to accomplish what is laid out below. Because this is a tricky situation, I request that Sami handle this particular Bean.]

Amvac, which imports all of the NAA it uses, desires to

[REDACTED] The impurities are always the same but the concentration of the active ingredient may lie a little above or below the certified limit range. In the meeting with Sami it was agreed that (especially since the current Basic CSF is obsolete) this situation can be covered by use of a revised Basic CSF that lists Amvac as the producer and the two overseas companies as the suppliers. This CSF is

DP BARCODE: D272325

CASE: 003342
SUBMISSION: S591798

DATA PACKAGE RECORD (CONTINUED)
BEAN SHEET

DATE: 01/31/01
Page 2 of 2

* * * DATA REVIEW INSTRUCTIONS * * *

included here. Also included is a fairly complete set of background documents concerning this Action, the products of the overseas manufacturers, etc.

Please comment on the acceptability of the revised Basic CSF.

Thanks,
John Bazuin

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
-------	----------------	----------	----------	-----	-----	-------



25 January, 2001

Ms. Cynthia Giles-Parker, PM-22
Document Processing Desk
Office of Pesticide Programs (H7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

**Subject: Resubmission of Confidential Statement of Formula:
1-Naphthaleneacetic Acid (EPA Reg. No. 5481-219)
Technical Naphthaleneacetic Acid (EPA Reg. No. 5481-430)
In Response to EPA Letter Dated August 24, 2000**

Dear Ms. Giles-Parker:

This is submitted in response to EPA letter (Dan Kenny) dated August 24, 2000, which denied our request for approval of AMVAC as an alternative source of the subject technical NAA (Naphthaleneacetic Acid) products. This submission is also a result of my meeting with Dr. Sami Malak and John Bazuin yesterday, in which we discussed details of revising the Confidential Statements of Formula (CSFs) to more accurately reflect the sources.

The most significant point made in the Agency's denial letter, more specifically Dr. Malak's August 9, 2000 review, indicated that the two existing alternative sources of technical grade NAA [REDACTED] were not registered. However, EPA [REDACTED] approved these sources for each of the subject product registrations.

Therefore, AMVAC hereby resubmits a modified request for EPA to approve AMVAC as a basic source of these products, based upon the proposed blending process as described in chemistry reports previously submitted May 25, 2000 (Ref. MRID Nos. 451430-01 through 05). This is described as option (b) in item 3c of Dr. Malak's review.

In reference to items 5 and 6 of Dr. Malak's review, we intend to submit label amendments to adjust the nominal concentration of the active ingredient to 95.5%, as indicated on the CSFs.

To reiterate our intentions, as discussed in our original request on May 25, 2000, we propose to use [REDACTED] into the subject products, meeting currently approved CSF specifications in all regards. This process would not result in the formation of an ingredient, impurity or otherwise, that is not currently recognized on the approved CSF. Example calculations, based on actual analytical values, are enclosed with a brief description of how the blending process would result in qualified product.

Manufacturing process information may be entitled to confidential treatment



In support of this request, please find the following documents enclosed for each product:

1. Registration Application (EPA form 8570-1)
2. Two copies of basic Confidential Statement of Formula indicating AMVAC as source. (Ref. 25-Jan-01). These basic CSFs are intended to supersede the current basic formulations that list [REDACTED] in [REDACTED] as the registered source (no longer used).
3. AMVAC Memorandum from W. Feiler, Director and V.P. of Technology (Ref. 19-Dec-00).

As AMVAC needs to resolve this issue as soon as possible in order to accommodate production schedules, and any effort to expedite this request would be greatly appreciated. If you need additional information, please don't hesitate to contact me at 949-260-1212 or 323-526-2388 (voicemail) or jonwood@earthlink.net. Thank you for your prompt consideration.

Best regards,

A handwritten signature in cursive script that reads 'Jon C. Wood'.

Jon C. Wood
Regulatory Manager

Product ingredient source information may be entitled to confidential treatment



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 5481-430	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Technical Naphthaleneacetic Acid	PM# PM 22	
5. Name and Address of Applicant (Include Zip Code) Amvac Chemical Corporation 4695 MacArthur Court Suite 1250 Newport Beach, CA 92660 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated <u>Aug-24-2000</u>	<input type="checkbox"/> Me Too" Application
<input type="checkbox"/> Notification - Explain below	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Basic Confidential Statement of Formulation: AMVAC Chemical Corporation (EPA Est. No. 5481-CA-01) as basic producer.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
If "Yes" Unit Packaging wt. No. per container		If "Yes" Package wt. No. per container		<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) <u>Filter Drum</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lb. Bag; 100 lb. drum		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued				<input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Jon C. Wood		Title Regulatory Manager		Telephone No. (Include Area Code) 323-526-2388 // 949-260-1212	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped)
2. Signature <i>Jon C. Wood</i>		3. Title Regulatory Manager			
4. Typed Name Jon C. Wood		5. Date <i>25-Jan-01</i>			

Commercial/financial information may be entitled to confidential treatment

PESTICIDE REGISTRATION ACTION TRACKING SYSTEM (PRATS) CODING FORM

BAR CODE: 5591798 ID NUMBER: 5481-430 ACTION CODE: 345

PM: 22 REVIEWER: Bazin DUE DATE: 4/25/01

DATE ON APPLICATION: 1/25/01

EPA RECEIVED DATE: 1/25/01

PM RECEIVED DATE: 1/25/01

APPLICANT: Amvac; Jon Weed

CHEM CODE (1): 056002 CHEM: NAA

CHEM CODE (2): _____ CHEM: _____

DESCRIPTOR: New Basic CSF to allow Amvac to become a producer by [REDACTED]

DATA REVIEWS:

HED: RCAB _____ TB _____ RCB _____ DRES _____

OREB _____

EFED: IO _____ EEB _____ EFGWB _____ ERCB _____

BEAD: ACB _____ BAB _____ EAB _____

RSB: PCRS _____ PRS _____ PCS _____

PM Team: Carl _____ Paul _____ Vern _____ Bill _____

FINAL ACTION: RESPONSE CODE: _____ RESPONSE DATE: ____/____/____

75-DAY RESPONSE: YES _____ NO _____ MOS: (1) CITE ALL

CRP: YES _____ NO _____ (4) NOT APPLICABLE

RESTRICTED USE: YES _____ NO _____ (8) SELECTIVE

EXCLUSIVE USE: YES _____ NO _____

MANUFACTURING USE: YES _____ NO _____

CONDITIONAL REGISTRATION/UNCONDITIONAL REGISTRATION

NOTES: _____

Manufacturing process information may be entitled to confidential treatment



John Bazuin

01/11/2001 03:19 PM



To: jonw@amvac-chemical.com
cc:
Subject: Blending in

Jon,

The meeting is set up with Sami Malak and Cynthia Giles-Parker (and me, of course) for 1:00 to 2:00 P.M. on Jan. 24 in Sami's office, Room 268 (my office number is Room 267). Cynthia's doing practically non-stop performance evaluations around that time and Wednesday afternoon was about the only time I could reasonably fit her in. This may not be Wednesday morning but it is as close as I could come and still get Cynthia to it, too. Please let me know if the time presents any problems for you.

John Bazuin

NAA Blender Meeting

Samir Malak

Tues, 1/23: Completely open

Wed, 1/24: Completely open

John Bazuin

Tues, 1/23: Completely open

Wed, 1/24: Completely open after
10:00 A.M.

Cynthia Giles-Pantier

Tues, 1/23: May be open 2:00-3:00 p.m.

Wed, 1/24: All the afternoon is open

Set it for 1/24 at 1:00 to 2:00 P.M. in
Samir's office



"Wood, Jon" <JonW@amvac-chemical.com> on 01/11/2001 05:53:45 PM

To: John Bazuin/DC/USEPA/US@EPA
cc:
Subject: RE: Blending in

John,
That time works OK for me.....let me know if anything changes,
otherwise I'll see you then.....and THANKS for making the
arrangements!.....Jon

-----Original Message-----

From: Bazuin.John@epamail.epa.gov [mailto:Bazuin.John@epamail.epa.gov]
Sent: Thursday, January 11, 2001 12:25 PM
To: jonw@amvac-chemical.com
Subject: Blending in

Jon,

The meeting is set up with Sami Malak and Cynthia Giles-Parker (and me, of course) for 1:00 to 2:00 P.M. on Jan. 24 in Sami's office, Room 268 (my office number is Room 267). Cynthia's doing practically non-stop performance evaluations around that time and Wednesday afternoon was about the only time I could reasonably fit her in. This may not be Wednesday morning but it is as close as I could come and still get Cynthia to it, too. Please let me know if the time presents any problems for you.

John Bazuin



"Wood, Jon" <JonW@amvac-chemical.com> on 01/09/2001 11:35:01 AM

To: John Bazuin/DC/USEPA/US@EPA
cc: Cynthia Giles-Parker/DC/USEPA/US@EPA
Subject: NAA Meeting.....

Hi John,


I plan to be in Wash. D.C. during the week of Jan 22 and propose that we meet to discuss the following NAA issues:

1. Technical Grade NAA blending process (AMVAC as alternate source). As you know, this also requires Chemistry's time (Sami).
2. Status of K-Salt Fruit Fix 24c's in the states of OR and WA.
3. Misc. NAA activities (CSF amendments, labeling).

I don't expect that this agenda would require much more than one hour to address, but any time you can provide would be greatly appreciated. I will travel on Monday, and be available for meetings Tues - Thurs a.m.. My schedule is still pretty flexible. Please contact me via Email or at 949-260-1212. THANKS!

Best Regards,

Jon

 Luis Suguiyama
11/01/99 03:02 PM

Sent by: Luis Suguiyama

To: John Bazuin/DC/USEPA/US@EPA
cc:
Subject: FOIA requests concerning Amvac Chemical Company's NAA registrations

Lets' help the FOIA office.

----- Forwarded by Luis Suguiyama on 11/01/99 03:01 PM -----

 Sherri Street
11/01/99 12:47 PM

To: Luis Suguiyama/DC/USEPA/US@EPA
cc:
Subject: FOIA requests concerning Amvac Chemical Company's NAA registrations


Hi Luis,

We truly need to close this case ASAP and need your assistance. To refresh your memory, please review the note Janet Bressant wrote you in May. Could you or someone in your branch get back with Janet or me before next Tuesday with a response?

Thank you in advance for your cooperation.

Sherri

----- Forwarded by Sherri Street/DC/USEPA/US on 11/01/99 12:42 PM -----


 Janet Bressant
10/28/99 01:17 PM

To: Sherri Street/DC/USEPA/US@EPA
cc:
Subject: FOIA requests concerning Amvac Chemical Company's NAA registrations

Sherri - The information below concerns Earl's request, RIN 1551-99.

Janet

----- Forwarded by Janet Bressant/DC/USEPA/US on 10/28/99 01:16 PM -----

 Janet Bressant
05/24/99 10:08 AM

To: Luis Suguiyama/DC/USEPA/US@EPA, Robert Perlis/DC/USEPA/US@EPA
cc: Earl Ingram/DC/USEPA/US@EPA
Subject: FOIA requests concerning Amvac Chemical Company's NAA registrations

We have received 2 FOIA requests (both from law firms) asking for all records, communications, letters,

etc., between EPA and Amvac Chemical Company (and vice versa) concerning the above subject between August, 1998 to the present. The records retrieved by the caseworker to respond to these requests were obtained from the registration files for several of Amvac's NAA products that were subject to conditions of continued registration. The majority of the records retrieved from these files within the time frame specified by each requestor were claimed as confidential business information by Amvac. This information has been segregated and will not be released by this office at this time. Each requestor will be given appeal rights in order to obtain the records determined to be CBI by Amvac, if they choose to proceed in that manner.

In addition to the records claimed CBI by Amvac, there were e-mail communications and meeting minutes relating to Amvac's proposal for the conditional registration of their NAA products. Was there any determination made on our part concerning the releasability of these records? In looking through them, I can see where some of the information contained within may be considered confidential, but I'm not certain.

Any guidance that you can provide concerning this will be much appreciated.

Janet Bressant
305-6445

To: John Bazuin/DC/USEPA/US@EPA
cc:
Subject: Amvac Agreement

Hi John:

I am sorry that we have not been quick in responding to request for comments on the Amvac agreement. Attached is a memo I am sending out via pouch. Steve Arbaugh will be taking the lead on this when he gets back from his holiday in January. He can be reached at (415) 744-1092, but if you want to talk to me about it please do not hesitate to call me.

please look at the second one. Not the first (it has some spelling errors)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Date: December 24, 1998

MEMORANDUM

SUBJECT: Amvac Agreement

FROM: Amy Miller, Enforcement Officer
Pesticides Program (CMD-4-3)

TO: John Bazuin
Office of Pesticides Program

Region IX has reviewed the documents pertaining to Amvac's conditional registration agreement. We hope that our comments can still be incorporated into this agreement. We are unsure at this time what the status is of this agreement, but we thought it important to inform you of some areas that need clarification.

1. Throughout the SOP's and conditional registration documents, it states "*A copy of the Notice of Arrival would be submitted to EPA Product Manager for NAA products and the appropriate EPA Regional Office.*" Under federal regulations the original Notice of Arrival must be submitted to the Regional office. The Notice of Arrival form is a carbon form which provides for one copy to the broker, one copy for US customs, and one copy for EPA. All pesticides that come into the US require a Notice of Arrival. The Regional office is required to review the Notice of Arrival for compliance with FIFRA. The Regional office signs and checks a box on the form directing the US Customs what to do with the shipment (e.g. release, detain, reject, etc...). After the Region reviews and signs the form, the Notice of Arrival is then sent back to the broker, who then gives the form to the US Customs. **The Region will not release a shipment, unless we receive the original Notice of Arrival.**

2. The SOP under *Importation of NAA Products*, in subparagraph 2, titled: *Registration of Amvac as a Source of NAA*, states that if the NAA is found not to meet specifications and if OPP approves, then Amvac can move the product from the bonded warehouse to their Los Angeles facility. It also states that a copy of a Notice of Arrival will be sent to OPP and the Regional office. When a product comes into the United States and goes into a bonded warehouse, it must be in compliance with all US regulations. **Prior to the products entry into the bonded warehouse a company must submit a Notice of Arrival and receive Regional approval.** U.S. Customs has set up bonded warehouses for the purpose of allowing an importer not to pay tariffs, until release from the bonded warehouse. The purpose of a bonded warehouse is not to defer compliance with other regulations.

Amvac's transfer of NAA must be in compliance with 40 CFR § 152.30 when the chemical is transferred from India to the bonded warehouse. The US Customs will ask for the Notice of Arrival for the Amvac product prior to its entry into the US and its movement into a bonded warehouse. No Notice of Arrival is required when the chemical is transferred between the bonded warehouse and the Los Angeles facility.

It is important that all transfers of unregistered products between facilities be in compliance with 40 CFR § 152.30. If you provide some deviation from the regulation, it will open the door for other companies to deviate from FIFRA regulations. You should be made aware that the transfer of unregistered pesticides, particularly imports, is being discussed between OECA, OPP and the regions. Tom Marvin in OECA can provide you with some background as to the national implications of deviations from the requirements of transferring unregistered pesticides.

3. What kind of labels will be on the product when it is transferred between India and the bonded warehouse? The agreement does not indicate what type of labels will be required.

4. Under the *Importation of NAA Products*, both alternatives (Interim and Registration of Amvac as a source) should have the same language as to export of product not in compliance. The language is inconsistent and may create some room for misinterpretation.

We hope that our comments are useful and can be incorporated into the agreement. Please call me if you have any questions at (415) 744-1101.

cc: Tom Marvin, OECA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Date: December 24, 1998

MEMORANDUM

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Pesticides Program (CMD-4-3)
TO: John Bazuin
Office of Pesticides Program

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cc: Tom Marvin, OECA



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REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Date: December 24, 1998

MEMORANDUM

SUBJECT: Amvac Agreement

FROM: ^{AM} Amy Miller, Enforcement Officer
Pesticides Program (CMD-4-3)

TO: John Bazuin
Office of Pesticides Program

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1. Throughout the SOP's and conditional registration documents, it states "*A copy of the Notice of Arrival would be submitted to EPA Product Manager for NAA products and the appropriate EPA Regional Office.*" Under federal regulations the original Notice of Arrival must be submitted to the Regional office. The Notice of Arrival form is a carbon form which provides for one copy to the broker, one copy for US customs, and one copy for EPA. All pesticides that come into the US require a Notice of Arrival. The Regional office is required to review the Notice of Arrival for compliance with FIFRA. The Regional office signs and checks a box on the form directing the US Customs what to do with the shipment (e.g. release, detain, reject, etc...). After the Region reviews and signs the form, the Notice of Arrival is then sent back to the broker, who then gives the form to the US Customs. **The Region will not release a shipment, unless we receive the original Notice of Arrival.**

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Amvac's transfer of NAA must be in compliance with 40 CFR § 152.30 when the chemical is transferred from India to the bonded warehouse. The US Customs will ask for the Notice of Arrival for the Amvac product prior to its entry into the US and its movement into a bonded warehouse. No Notice of Arrival is required when the chemical is transferred between the bonded warehouse and the Los Angeles facility.

It is important that all transfers of unregistered products between facilities be in compliance with 40 CFR § 152.30. If you provide some deviation from the regulation, it will open the door for other companies to deviate from FIFRA regulations. You should be made aware that the transfer of unregistered pesticides, particularly imports, is being discussed between OECA, OPP and the regions. Tom Marvin in OECA can provide you with some background as to the national implications of deviations from the requirements of transferring unregistered pesticides.

3. What kind of labels will be on the product when it is transferred between India and the bonded warehouse? The agreement does not indicate what type of labels will be required.

4. Under the *Importation of NAA Products*, both alternatives (Interim and Registration of Amvac as a source) should have the same language as to export of product not in compliance. The language is inconsistent and may create some room for misinterpretation.

We hope that our comments are useful and can be incorporated into the agreement. Please call me if you have any questions at (415) 744-1101.

cc: Tom Marvin, OECA

BERGESON & CAMPBELL, P.C.
1300 Eye Street, N.W.
Suite 1000 West
Washington, D.C. 20005

Telephone (202) 962-8585
Facsimile (202) 962-8599

DATE: December 22, 1998

TIME: 6:55PM

PLEASE DELIVER TO:

NAME: Mr. John Bazuin, Jr.

FAX NO.: 703/308-5320 or
 703/308-1825

FIRM: U.S. Environmental Protection Agency

FROM: Lynn L. Bergeson and Lisa M. Campbell

TOTAL NUMBER OF PAGES (including cover sheet): 4

TRANSMITTING TELECOPIER: (202) 962-8599

TRANSMISSION PROBLEMS, PLEASE CALL: Odeth Yalcin 202/962-8579

MESSAGE:

CONFIDENTIALITY NOTICE

The information in this facsimile is confidential and intended only for the use of the addressee. The data transmitted are attorney privileged and may be exempt from disclosure. Do not copy or distribute to anyone other than the addressee. Reliance on these data by other than the intended recipient is prohibited. Please notify us immediately if you have received this communication in error. Upon notification, we will arrange for return of the fax copies to Bergeson & Campbell, P.C. Thank you for your assistance.

THE ORIGINAL OF THIS DOCUMENT WILL BE SENT BY:

- ☐ REGULAR MAIL
- ☐ MESSENGER
- ☐ OVERNIGHT MAIL
- ☒ THIS WILL BE THE ONLY FORM OF DELIVERY OF THIS DOCUMENT

280-14

BERGESON & CAMPBELL, P.C.
1300 Eye Street, N.W.
Suite 1000 West
Washington, D.C. 20005

Telephone (202) 962-8585
Facsimile (202) 962-8599

DATE: December 22, 1998

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 - ☒ THIS WILL BE THE ONLY FORM OF DELIVERY OF THIS DOCUMENT
- 280-14

* Pages 95-97 Claimed confidential by submitter*

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Date: December 24, 1998

MEMORANDUM

SUBJECT: Amvac Agreement

FROM: Amy Miller, Enforcement Officer
Pesticides Program (CMD-4-3)

TO: John Bazuin
Office of Pesticides Program

Region IX has reviewed the documents pertaining to Amvac's conditional registration agreement. We hope that our comments can still be incorporated into this agreement. We are unsure at this time what the status is of this agreement, but we thought it important to inform you of some areas that need clarification.

1. Throughout the SOP's and conditional registration documents, it states "*A copy of the Notice of Arrival would be submitted to EPA Product Manager for NAA products and the appropriate EPA Regional Office.*" Under federal regulations the original Notice of Arrival must be submitted to the Regional office. The Notice of Arrival form is a carbon form which provides for one copy to the broker, one copy for US customs, and one copy for EPA. All pesticides that come into the US require a Notice of Arrival. The Regional office is required to review the Notice of Arrival for compliance with FIFRA. The Regional office signs and checks a box on the form directing the US Customs what to do with the shipment (e.g. release, detain, reject, etc...). After the Region reviews and signs the form, the Notice of Arrival is then sent back to the broker, who then gives the form to the US Customs. **The Region will not release a shipment, unless we receive the original Notice of Arrival.**

2. The SOP under *Importation of NAA Products*, in subparagraph 2, titled: *Registration of Amvac as a Source of NAA*, states that if the NAA is found not to meet specifications and if OPP approves, then Amvac can move the product from the bonded warehouse to their Los Angeles facility. It also states that a copy of a Notice of Arrival will be sent to OPP and the Regional office. When a product comes into the United States and goes into a bonded warehouse, it must be in compliance with all US regulations. **Prior to the products entry into the bonded warehouse a company must submit a Notice of Arrival and receive Regional approval.** U.S. Customs has set up bonded warehouses for the purpose of allowing an importer not to pay tariffs, until release from the bonded warehouse. The purpose of a bonded warehouse is not to defer compliance with other regulations.

Amvac's transfer of NAA must be in compliance with 40 CFR § 152.30 when the chemical is transferred from India to the bonded warehouse. The US Customs will ask for the Notice of Arrival for the Amvac product prior to its entry into the US and its movement into a bonded warehouse. No Notice of Arrival is required when the chemical is transferred between the bonded warehouse and the Los Angeles facility.

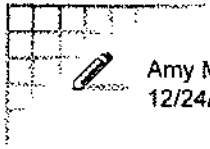
It is important that all transfers of unregistered products between facilities be in compliance with 40 CFR § 152.30. If you provide some deviation from the regulation, it will open the door for other companies to deviate from FIFRA regulations. You should be made aware that the transfer of unregistered pesticides, particularly imports, is being discussed between OECA, OPP and the regions. Tom Marvin in OECA can provide you with some background as to the national implications of deviations from the requirements of transferring unregistered pesticides.

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4. Under the *Importation of NAA Products*, both alternatives (Interim and Registration of Amvac as a source) should have the same language as to export of product not in compliance. The language is inconsistent and may create some room for misinterpretation.

We hope that our comments are useful and can be incorporated into the agreement. Please call me if you have any questions at (415) 744-1101.

cc: Tom Marvin, OECA



Amy Miller
12/24/98 01:18 PM

To: John Bazuin/DC/USEPA/US@EPA
cc:
Subject: Amvac Agreement

Hi John:

I am sorry that we have not been quick in responding to request for comments on the Amvac agreement. Attached is a memo I am sending out via pouch. Steve Arbaugh will be taking the lead on this when he gets back from his holiday in January. He can be reached at (415) 744-1092, but if you want to talk to me about it please do not hesitate to call me.



Amvac.wp Amvac.wp please look at the second one. Not the first (it has some spelling errors)

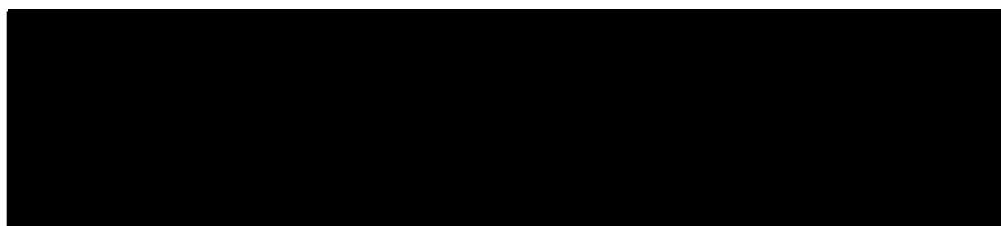


JonW@amvac-chemical.com on 07/12/2000 01:00:58 PM

To: John Bazuin/DC/USEPA/US@EPA
cc: Cynthia Giles-Parker/DC/USEPA/US@EPA, Dan Kenny/DC/USEPA/US@EPA
Subject: Sundance vs. Termilind Inventory.....

John,

The inventory associated with the pending repack amendments is as follows:



As you can see, only about 8.5% is labeled as Termilind material. Therefore, it does make sense to split these out in order to begin processing the Sundance side of the amendment while you're waiting for the Termilind jackets from Federal Records Center. Let me know if you agree with this strategy.

For your information, I spoke with Cynthia yesterday to further propose the "prioritization" of the two amendments. I suggest you speak with her next. Also, we scheduled a meeting for 9:00am on Friday 21-Jul to discuss the NAA actions, hopefully with you and Dan Kenny in attendance.

Please update me as things progress, and THANK YOU for your efforts in expediting these amendments!.....

You can contact me via Email or phone
949-260-1212.....

Best regards,

Jon



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

NOV 15 1998

Jon C. Wood
Amvac Chemical Corporation
2110 Davie Avenue
City of Commerce, California 90040

Subject: Conditions of continued registration for the following products

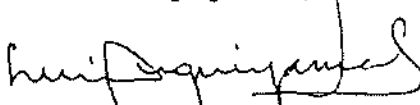
<u>EPA Reg. No.</u>	<u>Product Name</u>
5481-66	Alco Olive Stop
5481-129	Fruit Fix Concentrate 200
5481-130	Fruit Fix Super Concentrate
5481-219	1-Naphthaleneacetic Acid
5481-337	Alco Vitamin B-1 Hormone Concentrate
5481-413	K-Salt Fruit Fix 800
5481-414	K-Salt Fruit Fix 200
5481-426	Amid-Thin W
5481-428	Fruitone-N
5481-430	Technical Naphthaleneacetic Acid
5481-431	Technical 1-Naphthaleneacetamide

Dear Mr. Wood,

The memorandum of agreement dated November 19, 1998 and identified as "Amvac Chemical Corporation - Proposal to EPA Regarding NAA Products" (including a replacement for page 4, to correct an error, that was delivered by facsimile on December 3, 1998), together with the following attachments to this memorandum: 1) entitled "STANDARD OPERATING PROCEDURE: Registered Sources of Active Ingredients" and dated November 19, 1998, 2) entitled "STANDARD OPERATING PROCEDURE: Importation of NAA Products" and dated November 19, 1998, and 3) entitled "STANDARD OPERATING PROCEDURE: Quality Assurance/Quality Control" and dated November 19, 1998, required that reports be made to Agency headquarters in the Washington, D.C. area, as well as to the appropriate EPA Region, concerning the importation of shipments

of Naphthaleneacetic Acid (NAA) and its salts into the United States. The reports sent to Agency headquarters were specifically required to be sent to the "EPA Product Manager responsible for NAA pesticide products". Since then a change has occurred, namely that registration responsibility for Naphthaleneacetic Acid and its salts has been transferred from Registration Division to Biopesticides and Pollution Prevention Division (BPPD). The transition period for completing this transfer has also passed. Therefore, correspondence that is sent to EPA headquarters in the Washington, D.C. area concerning the importation of shipments of Naphthaleneacetic Acid and its salts into the United States should from now on be sent to Denise Greenway, Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division (7511C), the rest of the address remaining the same.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Luis Suguiyama", written over the typed name.

Luis Suguiyama
Chief
Fungicide Branch
Registration Division (7505C)



AMVAC CHEMICAL CORPORATIONTM

2110 DAVIE AVENUE, CITY OF COMMERCE, CALIFORNIA 90040
(323) 264-3910 FAX (323) 887-9221

01 October, 1999

Mr. Luis Suguiyama
Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Subject: Advisement of Quality Control Test Results of NAA Product at Bonded Warehouse

Dear Mr. Suguiyama:

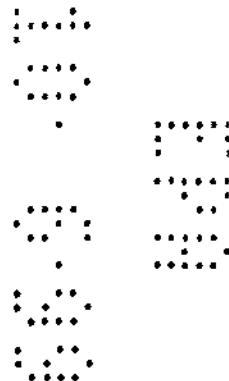
In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in your letter dated December 11, 1998, this is to advise EPA of quality control test results of product at the Nakano bonded warehouse. As indicated on the attached report, selected batches from shipments one, four, and five of 1-Naphthalene acetic acid (NAA) technical grade product (Ref. HBL Nos. MUM/LOA/075, MUM/LOA/347, and MUM/LOA/021) have been tested and comply with the approved Confidential Statement of Formula (CSF dated 18-May-98). The Notice of Arrival documents are being forwarded to EPA under separate cover.

It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,

Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)



Claimed confidential by submitter



AMVAC CHEMICAL CORPORATIONTM

2110 DAVIE AVENUE, CITY OF COMMERCE, CALIFORNIA 90040
(323) 264-3910 FAX (323) 887-9221

04 October, 1999

Mr. Luis Suguiyama
Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Subject: Notice of Arrival of NAA Product at Bonded Warehouse

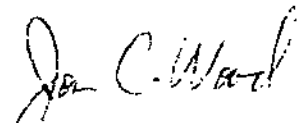
Dear Mr. Suguiyama:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in your letter dated December 11, 1998, attached please find an approved Notice of Arrival of Pesticides and Devices (EPA Form 3540-1) for each of the following selected batches from shipments of 1-Naphthalene acetic acid (NAA) technical grade product:

<u>NAA Shipment No.</u>	<u>HBL No.</u>	<u>Batch No.</u>	<u>Entry No.</u>
1	MUM/LOA/075	78, 84, 85	221-1307736-0
4	MUM/LOA/347	51, 52, 57	221-1307737-8
5	MUM/LOA/021	76	221-1307735-2

It is my understanding that this documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,


Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)

991001.jcw04.naa.us.reg

5
3
2
106

FAX

Date 9/28/99

Number of pages including cover sheet 4

TO: **Jon Wood**
Amvac Chemical

FROM: Darell R. Kennedy
Amvac Chemical
Corporation
4100 E. Washington Blvd.
Los Angeles, CA 90023

Phone (949) 476-1919

Fax Phone (949) 476-9303

Phone (323) 526-2337

Fax Phone (323) 269-4668

CC: W. Feiler

REMARKS: ☒ Urgent ☐ For your review ☐ Reply ASAP ☐ Please Comment

RE: 60 Drums (NAA) B/L Number MUM/LOA/075, Batch # 78, 84, 85 only, Weight 1,500 kg
60 Drums (NAA) B/L Number MUM/LOA/347, Batch # 51, 52, 57 only, Weight 1,500 kg
7 Drums (NAA) B/L Number MUM/LOA/021, Batch # 76 only, Weight 600 kg

Attached is the Notice of Arrival forms that have been approved by EPA.
If there are any questions, please call.

107



United States
Environmental Protection Agency
Washington, DC 20460

Notice of Arrival of Pesticides and Devices

Note: Read instructions on reverse before completing form

Send Completed Form to Appropriate Regional Office Listed on the Reverse of this Form

Part I: To Be Completed by Importer or Agent

1. Name and Complete Address of Shipper or Agent

JAMES J. BOYLE & CO.
2525 CORPORATE PLACE #100
MONTEREY PARK, CA 91754
T-323-263-8100

2. Name and Complete Address of Importer or Consignee

AMVAC CHEMICAL CORP.
4100 E. WASHINGTON BLVD.
LOS ANGELES, CA 90023

☒ Return Form to this Address

☐ Return Form to this Address

3. Name and Address of Shipper

M/S SABARI CHEMICALS PVT. LTD.
A2/236, G.I.D.C. ESTATES
NANDESARI 391 340, DIST. BARODA

4. EPA Registration Number

5481-219

5. EPA Producer Establishment No.

71758-IND-001

6. Brand Name of Product

N/A

7. Major Active Ingredients and Percentages of Each

1-Naphthalene

8. Unit Size

55 LBS

9. Quantity

60

10. Total Net Weight

3,307 LBS

11. Country of Origin

MUMBAI, INDIA

12. Port of Entry

2704 LOS ANGELES

13. Carrier

OOCL BRITAIN

14. Entry Number

221-1307736-0

15. Entry Date

9/22/99

16. I assert that information constituting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4, 5, 6, 7 are not entitled to CBI treatment - see instructions)

17. Location of Goods for Examination After Importation

W424 NAKANO WAREHOUSE 310-604-1556

18. Remarks

PRODUCT IS FOR REFORMULATION INTO PRODUCTS INTENDED AS GROWTH REGULATORS ON ORNAMENTAL APPLES, CHERRIES CITRUS FRUITS, OLIVES, PEARS & QUINCES.

Certification

I certify that the statements made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

19. Printed Name of Importer or Agent

JAMES J. BOYLE & CO.

Telephone Number

323-263-8100

20. Signature of Importer or Agent

BRUCE KANIDA/ATTY-IN-FACT

Date Signed

9/21/99

Part II: To Be Completed by U.S. Environmental Protection Agency

Action to be taken on shipment by U.S. Customs Service

☒ Release Shipment

☐ Detain for Inspection

☐ Release shipment to consignee under bond Shipment must be held intact pending inspections

☐ Other (Specify)

Remarks

M.H. ROOMING

Signature and Title of EPA Official

Date

Sept 24, 99

Part III: To Be Completed by U.S. Customs Service

The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted. The shipment was handled as instructed by EPA in Part II. Any deviations should be brought to the attention of EPA before releasing shipment and should also be noted in "Remarks".

Remarks

Signature of District Director of Customs

Date



United States
Environmental Protection Agency
Washington, DC 20460

Notice of Arrival of Pesticides and Devices

Note: Read instructions on reverse before completing form

Send Completed Form to Appropriate Regional Office Listed on the Reverse of this Form

Part I: To Be Completed by Importer or Agent

1. Name and Complete Address of Broker or Agent

JAMES J. BOYLE & CO.
2525 CORPORATE PLACE #100
MONTEREY PARK, CA 91754
T 323-263-8100

2. Name and Complete Address of Importer or Consignee

AMVAC CHEMICAL CORP.
4100 E. WASHINGTON BLVD.
LOS ANGELES, CA 90023

☒ Return Form to this Address

☐ Return Form to this Address

3. Name and Address of Shipper

M/S SABARI CHEMICALS PVT. LTD.
A2/236, G.I.D.C. ESTATES
NANDESARI 391 340, DIST. BARODA

4. EPA Registration Number

5481-219 ✓

5. EPA Producer Establishment No.

71758-IND-001 ✓

6. Brand Name of Product

N/A

7. Major Active Ingredients and Percentage of Each

1-Napthalenacetic acid

8. Unit Size

55 LBS.

9. Quantity

7

10. Total Net Weight

1,323 LBS. ✓

11. Country of Origin

MUMBAI, INDIA ✓

12. Port of Entry

2709 LOS BEACH ✓

13. Carrier

BOSPORUS BRIDGE

14. Entry Number

221-1307735-2 ✓

15. Entry Date

9/22/99 ✓

16. I assert that information constituting Confidential Business Information is shown in the above blocks numbered; (Note: Blocks 4,5,6,7 are not entitled to CBI treatment - see instructions)

17. Location of Goods for Examination After Importation

W424 NAKANO WAREHOUSE 310-604-1556

18. Remarks

PRODUCT IS FOR REFORMULATION INTO PRODUCTS INTENDED AS GROWTH REGULATOR ON ORNAMENTAL APPLES, CHERRIES, CITRUS FRUITS, OLIVES, PEARS & QUINCES

Certification

I certify that the statements made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

19. Printed Name of Importer or Agent

JAMES J. BOYLE & CO.

Telephone Number

323-263-8100

20. Signature of Importer or Agent

BRUCE KAMIDA/ATTY-IN-FACT

Date Signed

9/21/99

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☐ Detain for Inspection

☐ Release shipment to consignee under bond Shipment must be held intact pending inspections

☐ Other (Specify)

Remarks

Signature and Title of EPA Official

M. W. R. *Participate*
Shooter
Part III: To Be Completed by U.S. Customs Service

Date

Sept 24, 99

The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted. The shipment was handled as instructed by EPA in Part II. Any discrepancies should be brought to the attention of EPA before releasing shipment and should also be noted in "Remarks".

Remarks

Signature of District Director of Customs

Date



25 September, 2000

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Subject: Advisement of Arrival of NAA Products at Bonded Warehouse

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998 (Luis Suguiyama), this is to advise EPA of the arrival of 1-Naphthalene acetic acid (NAA), and Alpha naphthyl acetamide (NAD) technical grade products at the following bonded warehouse:

Nakano Warehouse & Transportation Corp.
18924 S. Laurel Park Rd.
Rancho Dominguez, CA 90220
EPA Est. No. 71812-CA-001

Attached you will find these shipment's Bills of Lading as well as summary details associated with all NAA/NAD product shipments received at the bonded warehouse to date, including those previously communicated to EPA in my letters of 22 December, 1998, January 15, 1999, and August 15, 2000. Following the pending analysis of the batches to determine suitability for importation, the analytical results and Notice of Arrival documents will be forwarded to EPA as required.

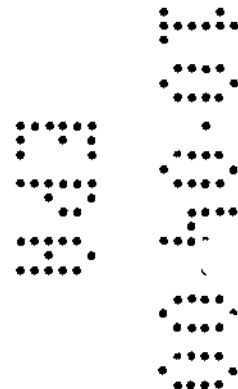
It is my understanding that the enclosed documentation fully complies with the aforementioned conditions of registration. Please contact me if you require additional information. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Jon C. Wood".

Jon C. Wood
Regulatory Manager

cc: Pamela Cooper (EPA / Region IX)





15 August, 2000

Ms. Cynthia Giles-Parker
Acting Chief, Fungicide Branch
Registration Division (7505C)
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

TO TAKE ACTION
ON THIS? IF SO,
I WILL
LOG IT IN.

EPH

DK

Subject: Notice of Arrival of NAA Products at Bonded Warehouse

Dear Ms. Giles-Parker:

In accordance with the conditions of continued registration of AMVAC's NAA products, as set forth in EPA's letter dated December 11, 1998 (Luis Suguiyama), this is to notify EPA of the analysis and arrival of 1-Naphthalene acetic acid (NAA), and Alpha naphthyl acetamide (NAD) technical grade products at the following bonded warehouse:

Nakano Warehouse & Transportation Corp.
18924 S. Laurel Park Rd.
Rancho Dominguez, CA 90220
EPA Est. No. 71812-CA-001

Attached you will find summary details that advise EPA of all NAA/NAD product shipments received at the bonded warehouse to date, including those previously communicated to EPA in my letters of 22 December, 1998, and January 15, 1999.

Also enclosed please find documentation (Bills of Lading, quality control analysis reports, and Notices of Arrival) pertaining to the following shipments of 1-Naphthalene acetic acid (NAA) and Alpha naphthyl acetamide (NAD) technical grade products:

<u>NAA Shipment No.</u>	<u>HBL No.</u>	<u>Batch No.</u>	<u>Entry No.</u>
7	PLAX12238A	1-13	221-1311063-3
<u>NAD Shipment No.</u>	<u>HBL No.</u>	<u>Batch No.</u>	<u>Entry No.</u>
5	PLAX12238	4, 5	221-1311064-1

We note that although all of the required documents associated with shipments 7 and 5 are enclosed, the mandatory time frame in which to file this report for shipments 7 and 5 with the agency has expired. This is due in part to a personnel change within Amvac in which the responsibility for communicating shipment information to the appropriate department was in transition. Additionally, the report experienced delays due to the filing of an incorrect Notice of Arrival form by our contracted customs broker.

Amvac realizes the importance of these notices. These procedural oversights have been addressed and we will make every effort to eliminate future delays. We appreciate your consideration in these matters. If you have any questions or require additional information, please do not hesitate to contact me at 949-260-1212 or Email jonwood@earthlink.net.

Sincerely,

Brinda K. Balaz / for

Jon C. Wood
Regulatory Manager

EPA

cc: Pamela Cooper (EPA / Region IX)



ATTN: MARK
United States Environmental Protection Agency
 Washington, DC 20460
Notice of Arrival of
Pesticides and Devices

Send Completed Form to
 Appropriate Regional Office
 Listed on the Reverse of this
 Form.

Form Approved
 OMB No. 2070-0020
 Approval expires 4-30-95

Note: Read Instructions on reverse before completing form.

Part I: To Be Completed by Importer or Agent

1. Name and Complete Address of Broker or Agent JAMES J. BOYLE & CO. 2525 CORPORATE PLACE #100 MONTEREY PARK, CA 91754			2. Name and Complete Address of Importer or Consignee AMVAC CHEMICAL CORPORATION 1754 4100 EAST WASHINGTON BLVD. LOS ANGELES, CA. 90023		
<input checked="" type="checkbox"/> Return Form to this Address			<input type="checkbox"/> Return Form to this Address		
3. Name and Address of Shipper M/S SABARI CHEMICALS PVT. LTD, A2/235, G.I.D.C. ESTATES NANDESARI 391 340, DIST. BARODA			4. EPA Registration Number 5481-219-AA ✓	5. EPA Producer Establishment No. 71758-IND-001 ✓	
			6. Brand Name of Product N/A		
7. Major Active Ingredients and Percentage of Each 1-NAPHTHALENE ACETIC ACID 97% INERT INGREDIENTS 3% OTHER INGREDIENTS					
8. Unit Size 75 KG	9. Quantity 13 DRUMS	10. Total Net Weight 975 KGS ✓	11. Country of Origin MUMBAI, INDIA ✓		
12. Port of Entry (2704) LOS ANGELES ✓			13. Carrier HANTIN AMSTERDAM VO03		
14. Entry Number 221-1311063-3 ✓		15. Entry Date 5/17/00	16. I assert that information constituting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4,5,6,7 are not entitled to CBI treatment—see instructions)		
17. Location of Goods for Examination After Importation W424 NAKANO WAREHOUSE					
18. Remarks PRODUCT IS FOR REFORMULATION INTO PRODUCTS INTENDED AS GROWTH REGULATOR ON ORNAMENTAL APPLES, CHERRIES, CITRUS, OLIVES, PEARS AND QUINCES					

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

19. Printed Name of Importer or Agent NISSEI IWAI AMERICAN CORP/LA C/O JAMES J. BOYLE & CO.	Telephone Number 323-263-8100	20. Signature of Importer or Agent BRUCE KAMINA/ATTY-IN-FACT ✓ <i>[Signature]</i>	Date Signed 8/4/00 ✓
---	----------------------------------	---	-------------------------

Part II: To Be Completed by U.S. Environmental Protection Agency

Action to be taken on shipment by U.S. Customs Service	
<input checked="" type="checkbox"/> Release Shipment	<input type="checkbox"/> Detain for inspection
<input type="checkbox"/> Other (Specify)	
Remarks: <i>15 Entry date: Entry date is correct. Is it the date released from US Customs or the date moved to bonded warehouse? We will release and follow up with US custom.</i>	
Signature and Title of EPA Official <i>[Signature]</i> M. L. ROOPE, Specialist	Date Aug 7 2000

Part III: To Be Completed by U.S. Customs Service

The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted. The shipment was handled as instructed by EPA in Part II. Any deviations should be brought to the attention of EPA before releasing shipment and should also be noted in "Remarks."

Remarks

Signature of District Director of Customs

Date

TOTAL P.02

AMVAC

Form Approved OMB No. 2070-06



United States
Environmental Protection Agency
Washington, DC 20460

Notice of Arrival of Pesticides and Devices

Note: Read Instructions on reverse before completing form

Send Completed Form to Appropriate Regional Office Listed on the Reverse of this Form

Part I: To Be Completed by Importer or Agent

1. Name and Complete Address of Broker or Agent

JAMES J. BOYLE & CO.
2525 CORPORATE PLACE #100 MONTEREY
PARK, CA 91754

2. Name and Complete Address of Importer or Consignee

AMVAC CHEMICAL CORPORATION
4100 EAST WASHINGTON BLVD.
LOS ANGELES, CA 90023

☐ Return Form to this Address

☐ Return Form to this Address

3. Name and Address of Shipper

M/S SAHARI CHEMICALS PVT. LTD.
A2/236, G.I.D.C. ESTATES
NANDESARI 391 340, DIST. BARODA

4. EPA Registration Number

5481-431

5. EPA Producer Establishment No.

71758-IND-001

6. Brand Name of Product N/A

7. Major Active Ingredients and Percentage of Each NAPHTALENE ACETAMIDA 97% 3% OTHER INGREDIENTS

8. Unit Size
75 KG.

9. Quantity
13 DRUMS

10. Total Net Weight
975 KG.

11. Country of Origin
MUMBAI, INDIA

12. Port of Entry
(2704) LOS ANGELES

13. Carrier
HANJIN AMSTERDAM VOO3

14. Entry Number
221-1311064-1

15. Entry Date
5/17/00

16. I assert that information constituting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4, 5, 6, 7 are not entitled to CBI treatment - see Instructions)

17. Location of Goods for Examination After Importation
W424 NAKANO WAREHOUSE

18. Remarks

PRODUCT IS FOR REFORMULATION INTO PRODUCTS INTENDED AS GROWTH REGULATOR ON ORNAMENTAL APPLES, CHERRIES, CITRUS, OLIVES, PEARS AND QUINCES

Certification

I certify that the statements made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

19. Printed Name of Importer or Agent

NISSHO IWAI AMERICAN CORP.
LA 6/O JAMES J. BOYLE & CO.

Telephone Number

323-263-8100

20. Signature of Importer or Agent

BRUCE J. BOYLE IN FACT 7/25/00

Part II: To Be Completed by U.S. Environmental Protection Agency

Action to be taken on shipment by U.S. Customs Service

☒ Release Shipment

☐ Detain for Inspection

☐ Release shipment to consignee under bond Shipment must be held intact pending inspections

☐ Other (Specify)

Remarks: #15 Entry Date: Entry date 5-17-00 is of concern. Is it the date released from U.S. Customs? Or the date released to bonded warehouse? We will follow up with U.S. Customs.

Signature and Title of EPA Official

M. W. ROOPE, Special Agent

Date

Aug 7, 2000

Part III: To Be Completed by U.S. Customs Service

The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted. The shipment was handled as instructed by EPA in Part II. Any deviations should be brought to the attention of EPA before releasing shipment and should also be noted in "Remarks".

Remarks

Signature of District Director of Customs

Date



jonw@amvac.net on 08/22/2000 11:54:13 AM

Please respond to jonw@amvac.net

To: John Bazuin/DC/USEPA/US

cc:

Subject: RE: NAA Product Chemistry reviews

Hi John,

I apologize for the busy signal messup.....if you ever need to contact me (even when I'm on vacation?), my pager # is 323-349-5918.....I did receive your FAX yesterday and am reviewing before calling Sami.....THANKS again for the info.....Jon

-----Original Message-----

From: Bazuin.John@epamail.epa.gov (mailto:Bazuin.John@epamail.epa.gov)

Sent: Monday, August 21, 2000 12:03 PM

To: jonwood@earthlink.net

Subject: NAA Product Chemistry reviews

Jon,

For some reason, every time I call you I get a busy signal. Do you want me to fax the subject materials to (949)476-9303?

John Bazuin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES
AUG 24 2000

Jon Wood
Amvac Chemical Corporation
4695 MacArthur Court, Suite 1250
Newport Beach, California 92660

Subject: Technical Naphthaleneacetic Acid
EPA Registration Number 5481-430
Alternate Confidential Statement of Formula (CSF) dated
May 25, 2000

Dear Mr. Wood,

The Alternate CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is not acceptable, for the following reasons. First, for an alternate technical source to be approved, it must first be registered. In order for the technical sources to be registered, their manufacturers must first satisfy a set of product chemistry data requirements, as specified in the attached Technical Review Branch (TRB) review. The data so far submitted are insufficient to satisfy these requirements. Second, the submitted CSF requires a correction to the nominal concentration. The attached TRB review also contains additional information concerning the needed data and the CSF correction.

If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,

Dan Kenny
Acting Product Manager (22)
Fungicide Branch
Registration Division (7505C)

Attachment: TRB/Product Chemistry review

DATE OUT: 09/AUG/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: A TECHNICAL GRADE [TGA]
DP BARCODE No.D267483 RECEIVED DATE:31/MAY/2000 REG./File Symbol No.:5481-430
PRODUCT: Technical Naphthaleneacetic acid, 95% NAA MRID 451430-01 to -05
COMPANY NAME: Amvac Chemical Corporation Action Code:345

FROM: Sami Malak, Chemist *Sami Malak*
Technical Review Branch/RD (7505C)

TO: 22 Cynthia Giles-Parker/John Bazuin
Fungicide Branch/RD (7505C)

INTRODUCTION:

This is an expedited review due on 10/AUG/2000.

In a letter dated 24/MAY/2000, the applicant requested review for acceptability an alternate formulation for subject product, CSF dated 25/MAY/2000. The applicant submitted some product chemistry data to support approval of an alternate technical source, 1-Naphthaleneacetic acid.

FINDINGS:

- 1a. The submitted alternate formulation for subject product, CSF dated 25/MAY/2000, is substantially similar to the currently approved basic formulation, CSF dated 27/MAY/1982, each contains 95% 1-Naphthaleneacetic acid plus impurities.
- 1b. The subject product is produced by an integrated production system, meaning that the alternate source, 1-Naphthaleneacetic acid, is not registered.
2. It was indicated on the submitted alternate formulation, also in the applicant's letter, that the technical source, 1-Naphthaleneacetic acid, is manufactured in the US. It was apparent, however, from the tracking sheet and MRIDs #451430-05 "certification of ingredient limits" & #451430-02 "Materials used for Production of 1-NAA" that [REDACTED] sources are imported from [REDACTED] and [REDACTED] and mixed together to achieve the claimed nominal concentration. One current alternate formulation, CSF dated 23/APR/1996 is produced in [REDACTED]. It appears that this alternate source must have been approved under the same Reg. No., 5481-430, as that of the basic formulation. However, the technical source in the current alternate formulation is not registered.
- 3a. To approve an alternate technical source, it must be registered. To register the technical source from [REDACTED] and/or [REDACTED], the applicant can request the manufacturer of either or both sources to submit directly to the EPA product chemistry data requirements of GRN's 830-1600, -1620, -1670 & -1700 corresponding to description of materials used to produce the product, description of production process, discussion of formation of impurities, and

preliminary analysis, respectively. The submitted information on these requirements are insufficient.

- 3b. The applicant can reference product chemistry data requirements of GRN 830-1800 and all the physical/chemical properties corresponding to the analytical method and the physical/chemical properties that were used to support registration of subject product.
- 3c. After registration of the technical source form [REDACTED] and/or [REDACTED], an alternate formulation using a registered alternate source can be approved. Options: (a) the applicant can request a separate registration number different from 5481-430 supported with a label and CSF; or (b) supersede the existing basic formulation, CSF dated 27/MAY/1982. It should be noted that each source must be reviewed separately. Mixing [REDACTED] different sources can be permitted after reviewing and approval of the composition of each source.
4. Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the technical source, Reg. No. 5481-430, in the current basic formulation, CSF dated 27/MAY/1982.
5. The label claim nominal concentration of 95% is inconsistent with that on the CSF. For a TGAI, what is claimed in Column 13(b) of the CSF is the nominal concentration of the pure ingredient consistent with that on the label, not percentage by weight. Material balance of $\geq 98\%$ would be in the form of impurities and associated ingredients.
6. The submitted product's alternate formulation CSF dated 25/MAY/2000 will need a minor correction to list the nominal concentration in Column 13(b) at 95% instead of the claimed 95.5% consistent with certification of ingredients limits and the label claim nominal concentration (refer to Finding 5 above).

CONCLUSIONS:

We object to this action pending resolution of Finding 3(a) & 6 above.

NOTE TO CRM:

The applicant should be advised of Findings 3(b), 3(c) & 5 above.

REVIEW OF PRODUCT CHEMISTRY DATA:

1. A statement of data confidentiality dated 01/MAR/2000 was included with this submission claiming confidentiality of some of the data requirements on the basis of its falling within the scope of FIFRA§10(d)(1)(A), (B), or (C). Review of CBI information is to be found in Confidential Appendix A.
2. A GLP statement dated 01/MAR/2000 was included with this submission to the effect that some of the submitted studies were conducted in compliance with GLP requirements of 40CFR§160.

DATA SUBMITTED

MRID #451430-01 The submitted study entitled: "Product Identity and Composition of Technical Naphthaleneacetic acid, Data Requirement of Guideline Series 830-1550." The study was authored by Gary Braden of Amvac Chemical Corporation; Performed by Amvac Chemical Corporation of City of Commerce, CA; Completed on 25/FEB/2000 (7 pages).

MRID #451430-02 The submitted study entitled: "Materials Used for Production of Technical Naphthaleneacetic acid, Data Requirement of Guideline Series 830-1600." The study was authored by Gary Braden of Amvac Chemical Corporation; Performed by Amvac Chemical Corporation of City of Commerce, CA; Completed on 25/FEB/2000 (6 pages).

MRID #451430-03 The submitted study entitled: "Production Process for Technical Naphthaleneacetic acid, Data Requirement of Guideline Series 830-1620." The study was authored by Gary Braden of Amvac Chemical Corporation; Performed by Amvac Chemical Corporation of City of Commerce, CA; Completed on 25/FEB/2000 (6 pages).

MRID #451430-03 The submitted study entitled: "Production Process for Technical Naphthaleneacetic acid, Data Requirement of Guideline Series 830-1620." The study was authored by Gary Braden of Amvac Chemical Corporation; Performed by Amvac Chemical Corporation of City of Commerce, CA; Completed on 25/FEB/2000 (6 pages).

MRID #451430-04 The submitted study entitled: "Formation of Impurities in Technical Naphthaleneacetic acid, Data Requirement of Guideline Series 830-1670." The study was authored by Gary Braden of Amvac Chemical Corporation; Performed by Amvac Chemical Corporation of City of Commerce, CA; Completed on 25/FEB/2000 (6 pages).

MRID #451430-05 The submitted study entitled: "Certification of Limits for Technical Naphthaleneacetic acid, Data Requirement of Guideline Series 830-1750." The study was authored by Gary Braden of Amvac Chemical Corporation; Performed by Amvac Chemical Corporation of City of Commerce, CA; Completed on 25/FEB/2000 (6 pages).

Group A, Series 830-Product Identity, Composition, and Analysis (40 CFR 155, 160, 162, 167, 175 & 180)

830-1550 Product Identity and Composition

This product contains one non-registered technical grade of active ingredient plus impurities (refer to product's CSF dated 25/MAY/2000).

830-1600 Description of Materials Used to Produce the Product:

Refer to Confidential appendix A.

830-1620 Description of Production Process:

Refer to Confidential appendix A.

830-1670 Discussion of Formation of Impurities:

Refer to Confidential appendix A.

830-1700 Preliminary Analysis:

Refer to Confidential appendix A.

830-1750 Certified Limits:

Refer to Confidential appendix A.

830-1800 Enforcement Analytical Method:

Adequate analytical method is available for enforcement. The method was previously submitted and reviewed in connection with registration of the technical source, Reg. No. 5481-430, in the current basic formulation, CSF dated 27/MAY/1982.

Confidential Appendix A

830-1600 Description of Materials Used to Produce the Product:

One non-registered technical grade of active ingredient, 95% nominal, plus impurities (refer to product's CSF dated 25/MAY/2000).

[REDACTED]

830-1620 Description of Production Process:

The process described in MRID #451430-03 consisted of [REDACTED] to achieve a nominal concentration of 95%.

830-1670 Discussion of Formation of Impurities:

Impurities reported in MRID #451430-01 are the same as those reported on the submitted CSF, an alternate formulation dated 25/MAY/2000.

830-1700 Preliminary Analysis:

No analyses was performed. Instead, the applicant reported information from two suppliers of 1-NAA (refer to GRN 830-1750 below).

830-1750 Certified Limits:

The applicant report on certification of limits based on analyses of technical 1-NAA from two suppliers. 1-NAA was reported at 95% minimum plus a maximum of [REDACTED] impurities. On the submitted CSF, 1-NAA was claimed at 95.5% plus impurities at [REDACTED], erroneously listed as percentages by weight.

DP BARCODE: D267483

#10725

CASE: 003342
SUBMISSION: S581761

DATA PACKAGE RECORD
BEAN SHEET

DATE: 07/17/00
Page 1 of 2

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 345 TECH-FORMULA CHANGE AMND
RANKING : 5 POINTS ()
CHEMICALS: 056002 NAA

95.0000%

ID#: 005481-00430 TECHNICAL NAPHTHALENEACETIC ACID
COMPANY: 005481 AMVAC CHEMICAL CORP
PRODUCT MANAGER: 22 CYNTHIA GILES-PARKER 703-305-7740 ROOM: CM2 249
PM TEAM REVIEWER: JOHN BAZUIN 703-305-7381 ROOM: CM2 267
RECEIVED DATE: 05/31/00 DUE OUT DATE: 08/29/00

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 267483 EXPEDITE: Y DATE SENT: 07/17/00 DATE RET.: / /
CHEMICAL: 056002 NAA

DP TYPE: 001 Submission Related Data Package

CSF: Y LABEL: N
ASSIGNED TO DATE IN DATE OUT ADMIN DUE DATE: 9-3-00
DIV : RD / / / /
BRAN: TRB / / / /
SECT: CHEM / / / /
REVR : *Simalak* 8/2/00 8/9/00
CONTR: / / / /

* * * DATA REVIEW INSTRUCTIONS * * *

This is an Alternate CSF for the subject product that has been submitted by Amvac. The Action also came with the 5 attached studies. What is going on here is that Amvac imports all of its Technical NAA [REDACTED] [REDACTED] [REDACTED]. Because there have been some irregularities in the handling of the NAA product in the past, Amvac also is currently operating under a set of conditions of registration for most of their NAA (and salts) products. These conditions require them to keep the Agency fully informed about importation of batches of NAA product, the quality of that product, and the subsequent fate of that product. So far, any imported NAA batches that failed to meet the specs of the CSF for the appropriate U.S. product have had to be sent back offshore. However, we agreed, at the start, to potentially let Amvac reformulate and sell out-of-spec batches of imported NAA under the Reg. Number(s) of their own products if they could satisfactorily show us what the composition of the imported batches was, tell us how they would bring the batches within the specs of their product's CSF, and finally showed us that they had done so successfully. The concept is that they therefore become an additional manufacturer of the product, documented by use of an Alternate CSF. That is what they are attempting to do here. Please comment on this submission--as to whether you

DP BARCODE: D267483

CASE: 003342 DATA PACKAGE RECORD (CONTINUED)
SUBMISSION: S581761 BEAN SHEET

DATE: 07/17/00
Page 2 of 2

* * * DATA REVIEW INSTRUCTIONS * * *

judge this approach to be acceptable and as to whether the materials and process are adequately documented.

Thanks,
John Bazuin

P.S. An identical Bean, relying on the same studies, should also be present for 5481-219.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES
OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION
FUNGICIDE-HERBICIDE BRANCH

Fax Number (703) 308 - 5320

FACSIMILE REQUEST/COVER SHEET

SEND FAX TO:

NAME: Jon Wood
OFFICE: Amvac Chemical Company
FAX PHONE NO.: (949) 260-1212
OFFICE PHONE NO.: (949) 476-9303

FROM:

NAME: John Bazuin, Jr.
DIVISION/BRANCH: RD/FB/Team 22
OFFICE PHONE NO.: (703) 305-7381
LOCATION/OFFICE ROOM NO.: Crystal Mall 2 - 1921 Jefferson
Davis Hwy., 2nd Floor, Room 267
MAILCODE: (7505C) DATE: 8 / 21 / 2000 TIME: _____
NUMBER OF PAGES (WITH COVER SHEET): 13

MESSAGE:

Jon,
Here are the reviews concerning Amvac's NAA products that
you were interested in receiving.

John Bazuin



jonw@amvac.net on 06/30/2000 12:52:03 PM

Please respond to jonw@amvac.net

To: Cynthia Giles-Parker/DC/USEPA/US
cc: John Bazuin/DC/USEPA/US, Dan Kenny/DC/USEPA/US
Subject: RE: NAA

Hi Cynthia,

I really appreciate your efforts in helping track our important NAA amendments. I spoke with Dan Kenny yesterday and he now has both of these "time-sensitive" actions on his desk. I briefed him on the purpose of the amendments and also gave him a little background on the relevant NAA issues (importation agreement, etc.). He intends to speak with John Bazuin when he returns to get a more complete story. John and I have had several conversations regarding these amendments, and we had initially hoped to have the TRB review done in early July. However, as you know, we lost valuable time while the packages were diverted to BPPD.

These actions are Amvac's first priority with the Agency. In order to accommodate this fall's production schedules, we need to accomplish both amendments before August. I fully realize that the Agency has it's own priorities and that from where we are now that target seems a bit optimistic. However, I also believe that both actions are pretty straightforward and may not require a great deal of technical analysis, especially in light of the fact that some of the groundwork has been laid through conversations with John, Carl Grable, and Sami Malak.

Any efforts to expedite these reviews would be greatly appreciated. I am always available to respond to questions and can be reached here via Email or at 949-260-1212 during west coast working hours or at 323-526-2388 for 24-hour voicemail. I have plans to visit the Agency in mid-July and would welcome the opportunity to meet with you or any member of your staff to discuss these or any of Amvac's regulatory projects.

Thanks again for your consideration.

Best regards,

Jon

-----Original Message-----

From: Giles-Parker.Cynthia@epamail.epa.gov
[mailto:Giles-Parker.Cynthia@epamail.epa.gov]

Sent: Thursday, June 29, 2000 7:51 AM
To: Jonwood@earthlink.net
Cc: Kenny.Dan@epamail.epa.gov
Subject: NAA

Hi Jon,

I called you twice this morning, but the operators were not able to reach you.

However, Denise Greenway has delivered two amendments dated May 24th to our office today. These amendments are for products 5481-413 and 5481-414. I also

received an amendment from your company with bound copies of data. I do not have the package on my desk at this time, but this information has been given to

the PM for Team to handle. Dan Kenny is the acting PM for Team 22. He can be reached on 305-7546. If you have any additional questions please give Dan or me a call.

Thanks

FACSIMILE TRANSMISSION
(Cover Page)

To: Cynthia Giles-Parker
U.S. EPA

Date: 18 Jul, 2000

Fax: (703) 308-1825

cc: Dan Kenny
John Bazuin

Phone: (703) 305-7740

From: Jon Wood
Regulatory Manager

Fax: (949) 476-9303

Phone: (949) 260-1212

Subject: NAA Meeting Scheduled for 9:00 a.m. on Friday 21-Jul-00

Cynthia:

I propose we discuss the following NAA issues at our meeting this Friday:

1. Registration of Amvac as a source of NAA Technical (submitted 25-May-00)

[REDACTED]

1. Repackaging of Sundance and Termilind inventory (submitted 24-May-00).

Acquisition of registered end-use formulation inventory

1. Fruitone N label amendment (submitted 28-Apr-00)

Revised Directions For Use

1. Minor CSF amendments to end-use formulations (K-Salt Fruit Fix 200 & 800, Amcotone), under review with BPPD? (submitted 25-Mar-99)

*Listed both registered NAA technical products
Corrected ingredient percentages*

1. Data compensation issues

I appreciate you and your staff taking time from your busy schedules to meet with me to discuss these important issues. I suspect we can cover these topics in about one hour, but I will be available beyond that if necessary. If you have questions about these agenda items, I can be reached today at (949) 260-1212, and thereafter at (323) 526-2388 (voice) or Email at jonwood@earthlink.net.

Best regards,

TOTAL NUMBER OF PAGES (including cover page): 1



JonW@amvac-chemical.com on 07/18/2000 03:09:26 PM

To: Cynthia Giles-Parker/DC/USEPA/US@EPA
cc: Dan Kenny/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
Subject: NAA Meeting.....

Hi Cynthia,

After speaking with John Bazuin this morning, I need to confirm the time of our meeting. John indicated that he was not scheduled to work on Friday. I feel it is important that he attend because of his extensive involvement with NAA. I am available Thursday afternoon (anytime after 12:00), but John indicated that you may be booked up, and we're not sure about Dan's availability. I hate to even suggest it, but if we must split the meeting into two parts, I could meet with John Thursday afternoon and recap with you on Friday morning.

The attached is a proposed agenda. Please check your schedule and let me know how we can squeeze in about an hour of NAA discussion. THANKS for your consideration.

Best regards,

Jon


<<000718jcw01 NAA Mtg. Email to EPA.doc>>



- 000718jcw01 NAA Mtg. Email to EPA.doc

 Dan Kenny

07/03/2000 11:39 AM

To: jonw@amvac.net
cc: Cynthia Giles-Parker/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
Subject: RE: NAA 

Hi John,

I have briefed John Bazuin about these amendments, and he seemed to be fairly familiar with them. He plans to get the data over to TRB as soon as possible. Obviously, he has a tremendous amount going on since it's his first day back in the office, but he indicated that he would make an effort to get things started for you right away. We'll keep you filled in on the progress.

-Dan Kenny

jonw@amvac.net on 06/30/2000 12:52:03 PM



jonw@amvac.net on 06/30/2000 12:52:03 PM

Please respond to jonw@amvac.net

To: Cynthia Giles-Parker/DC/USEPA/US
cc: John Bazuin/DC/USEPA/US, Dan Kenny/DC/USEPA/US
Subject: RE: NAA

Hi Cynthia,

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Any efforts to expedite these reviews would be greatly appreciated. I am always available to respond to questions and can be reached here via Email or at 949-260-1212 during west coast working hours or at 323-526-2388 for 24-hour voicemail. I have plans to visit the Agency in mid-July and would welcome the opportunity to meet with you or any member of your staff to discuss these or any of Amvac's regulatory projects.

Thanks again for your consideration.

Best regards,

Jon

-----Original Message-----

From: Giles-Parker.Cynthia@epamail.epa.gov
[mailto:Giles-Parker.Cynthia@epamail.epa.gov]
Sent: Thursday, June 29, 2000 7:51 AM
To: Jonwood@earthlink.net
Cc: Kenny.Dan@epamail.epa.gov
Subject: NAA

Hi Jon,

I called you twice this morning, but the operators were not able to reach you.

However, Denise Greenway has delivered two amendments dated May 24th to our office today. These amendments are for products 5481-413 and 5481-414. I also received an amendment from your company with bound copies of data. I do not have the package on my desk at this time, but this information has been given to the PM for Team to handle. Dan Kenny is the acting PM for Team 22. He can be reached on 305-7546. If you have any additional questions please give Dan or me a call.

Thanks



jonw@amvac.net on 07/05/2000 11:27:31 AM

Please respond to jonw@amvac.net

To: Dan Kenny/DC/USEPA/US@EPA
cc: Cynthia Giles-Parker/DC/USEPA/US@EPA, John Bazuin/DC/USEPA/US@EPA
Subject: RE: NAA

Hi Dan,

Thanks for the update. I'll avoid pestering John as I most certainly understand the impact of the "inbox" following time away from the office! I'll keep an eye on my Email for updates on TRB's progress. Should questions arise, I can also be contacted at 949-260-1212 or 323-525-2388 (voicemail). Thanks again for your efforts.

Best regards,

Jon

-----Original Message-----

From: Kenny.Dan@epamail.epa.gov [mailto:Kenny.Dan@epamail.epa.gov]
Sent: Monday, July 03, 2000 8:39 AM
To: jonw@amvac.net
Cc: Giles-Parker.Cynthia@epamail.epa.gov; Bazuin.John@epamail.epa.gov
Subject: RE: NAA

Hi John,

I have briefed John Bazuin about these amendments, and he seemed to be fairly familiar with them. He plans to get the data over to TRB as soon as possible. Obviously, he has a tremendous amount going on since it's his first day back in the office, but he indicated that he would make an effort to get things started for you right away. We'll keep you filled in on the progress.

-Dan Kenny

jonw@amvac.net on 06/30/2000 12:52:03 PM

Please respond to jonw@amvac.net

To: Cynthia Giles-Parker/DC/USEPA/US
cc: John Bazuin/DC/USEPA/US, Dan Kenny/DC/USEPA/US
Subject: RE: NAA

Hi Cynthia,

I really appreciate your efforts in helping track our important NAA amendments. I spoke with Dan Kenny yesterday and he now has both of these "time-sensitive" actions on his desk. I briefed him on the purpose of the amendments and also gave him a little background on the relevant NAA issues (importation agreement, etc.). He intends to speak with John Bazuin when he returns to get a more complete story. John and I have had several conversations regarding these amendments, and we had initially hoped to have the TRB review done in early July. However, as you know, we lost valuable time while the packages were diverted to BPPD.

These actions are Amvac's first priority with the Agency. In order to accommodate this fall's production schedules, we need to accomplish both amendments before August. I fully realize that the Agency has it's own priorities and that from where we are now that target seems a bit optimistic. However, I also believe that both actions are pretty straightforward and may not require a great deal of technical analysis, especially in light of the fact that some of the groundwork has been laid through conversations with John, Carl Grable, and Sami Malak.

Any efforts to expedite these reviews would be greatly appreciated. I am always available to respond to questions and can be reached here via Email or at 949-260-1212 during west coast working hours or at 323-526-2388 for 24-hour voicemail. I have plans to visit the Agency in mid-July and would welcome the opportunity to meet with you or any member of your staff to discuss these or any of Amvac's regulatory projects.

Thanks again for your consideration.

Best regards,

Jon

-----Original Message-----

From: Giles-Parker.Cynthia@epamail.epa.gov
[mailto:Giles-Parker.Cynthia@epamail.epa.gov]
Sent: Thursday, June 29, 2000 7:51 AM
To: Jonwood@earthlink.net
Cc: Kenny.Dan@epamail.epa.gov
Subject: NAA

Hi Jon,

I called you twice this morning, but the operators were not able to reach you.

However, Denise Greenway has delivered two amendments dated May 24th to our office today. These amendments are for products 5481-413 and 5481-414. I also

received an amendment from your company with bound copies of data. I do not have the package on my desk at this time, but this information has been given to the PM for Team to handle. Dan Kenny is the acting PM for Team 22. He can be reached on 305-7546. If you have any additional questions please give Dan or me a call.

Thanks



Jon C. Wood
Regulatory Manager

4695 MacArthur Court, Suite 1250
Newport Beach, CA 92660
Email: jonwood@earthlink.net

(949) 260-1212 office
(949) 476-9303 fax

25 May, 2000

451430-00

Ms. Cynthia Giles-Parker, PM-22
Document Processing Desk
Office of Pesticide Programs (H7505C)
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Subject: Proposed Alternative Formulation:
1-Naphthaleneacetic Acid (EPA Reg. No. 5481-219)
Technical Naphthaleneacetic Acid (EPA Reg. No. 5481-430)

Dear Cynthia:

This is to request approval of Amvac as an alternative source of formulation of the subject technical NAA (Naphthaleneacetic Acid) products. In support of this request, please find the following documents enclosed as required for each product:

1. Registration Application (EPA form 8570-1).
2. Two copies of Confidential Statement of Formula indicating Amvac as an alternative source (Ref. 25-May-00).
3. Three copies of the following product chemistry reports (with Confidential Attachments):

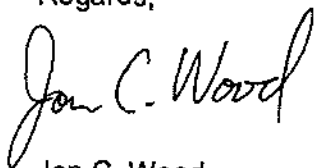
<u>Study Title</u>	<u>Study No.</u>	<u>GL Series No.</u>	<u>MRID No.</u>
Product Identity and Composition	ING 013.3	830.1550	45143001
Materials Used for Production	RAW 013.3	830.1600	45143002
Production Process	PROC 013.3	830.1620	45143003
Formation of Impurities	IMP 013.3	830.1670	45143004
Certified Limits	CL 013.3	830.1750	45143005

As described in the enclosed Production Process report, Amvac proposes

All of the manufacturing proposed herein would be conducted at Amvac's registered Pesticide Producing Establishment (EPA Est. No. 5481-CA-01). Most importantly, this processing would be conducted in full compliance with all importation and distribution procedures and conditions related to Amvac's NAA registrations, as described in the Agency's letter dated December 11, 1998.

Any effort to expedite this request would be greatly appreciated. If you have any questions or require additional information, please don't hesitate to contact me at 949-260-1212, or voicemail 323-526-2388, or Email jonwood@earthlink.net. As always, I welcome the opportunity to meet with you and your staff to discuss this or any of Amvac's regulatory projects. Thank you in advance for your efforts.

Regards,



Jon C. Wood
Regulatory Manager



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

264675

Application for Pesticide - Section I

1. Company/Product Number 548 t-430	2. EPA Product Manager Cynthia Giles-Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Technical Naphthaleneacetic Acid	PM# PM 22 91	
5. Name and Address of Applicant (Include Zip Code) Amvac Chemical Corporation 4695 MacArthur Court Suite 1250 Newport Beach, CA 92660 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
Notification - Explain below	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Alternative Confidential Statement of Formulation: Amvac Chemical Corporation (EPA Est. No. 548 t-CA-0 t) as an alternative producer.

Section - III

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted	If "Yes" Unit Packaging wt.	No. per container	If "Yes" Package wt.	<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) Fiber Drum	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 lb. bag; 100 lb. drum	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithographed <input checked="" type="checkbox"/> Paper glued				<input type="checkbox"/> Stenciled <input type="checkbox"/> Other	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Jon C. Wood		Title Regulatory Manager		Telephone No. (Include Area Code) 323-526-2388 • 714-949-260-12 t2	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					8. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Manager			
4. Typed Name Jon C. Wood		5. Date 25-May-00			



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☐ Other

OPP Identifier Number

264675

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name)	PM#	
5. Name and Address of Applicant (include ZIP Code) <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
Notification must be submitted	If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name	Title	Telephone No. (Include Area Code)
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature	3. Title	
4. Typed Name	5. Date	

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, II, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

06/12/2000

JON C. WOOD
AMVAC CHEMICAL CORP
4695 MACARTHUR COURT, SUITE 1250
NEWPORT BEACH CA 926601706

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: 1-NAPHTHALEACETIC ACID
COMPANY NAME: AMVAC CHEMICAL CORP
OPP IDENTIFICATION NUMBER: 264620
EPA REGISTRATION NUMBER: 5481-219
EPA RECEIPT DATE: 05/31/2000

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Sheryl Reilly, Product Manager 91, at (703) 308-8269.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. White", is written below the word "Sincerely,".

Front End Processing Staff
Information Services Branch
Program Management and Support Division

5581759
5581761

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

JUN 21 2000

AMVAC CHEMICAL CORPORATION
ATTN: JON C. WOOD
4695 MACARTHUR CT., SUITE 1250
NEWPORT BEACH, CA 926601706

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 05/31/00. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

John

01
Cynthia

This is an ACCEPTED submission.

One copy of the PPC diagnosis and one copy of the annotated bibliography are provided for your files. The PPC has already mailed out the submitter's copy of the two documents.

This is a PARTIALLY ACCEPTED/COMPLETELY REJECTED submission.

A copy of the PPC diagnosis and the annotated bibliography are provided for your files. A second copy is provided for your use in corresponding with the data submitter.

JOHN THERE ARE 2 SUBMISSIONS
HERE (ROUTE DATA UNDER 1 OF THE
SUBMISSIONS AND THE DER SHOULD
APPLY TO BOTH (IF I UNDERSTAND
THIS CORRECTLY)).

①

5481-219

345

5581759

② 5481-430

345

5581761.

APPLICATION FOR AMENDMENT

WITH DATA

NO DATA

INIT.

DATE

INIT.

DATE

FEU fw 6-12-00

FEU _____

SIG (DATA) _____

PM _____

PM 91 _____

FRONT END PROCESSING APPLICATION INFORMATION CHECK LIST

PM 9/

EPA COMPANT NUMBER 5481-436

EPA REGISTRATION NUMBER STATUS ACTIVE ☒ CANCELLED _____
(FOR AMENDMENTS)

NOT IN REFS _____

"ME-TOO" CITED PRODUCT STATUS ACTIVE _____ CANCELLED _____

NOT IN REFS _____

OPP# 264675 DATE 6-12-00

PESTICIDE REGISTRATION ACTION TRACKING SYSTEM (PRATS) CODING FORM

BAR CODE: 5581761 ID NUMBER [REDACTED] ACTION CODE: 345

PM: 22 REVIEWER: Bazuin DUE DATE: 8 / 29 / 2000

DATE ON APPLICATION: 5 / 25 / 2000

EPA RECEIVED DATE: 5 / 31 / 2000

PM RECEIVED DATE: 7 / 3 / 2000

APPLICANT: Amvac Chem. Co., John Wood

CHEM CODE (1): 056002 CHEM: NAA

CHEM CODE (2): _____ CHEM: _____

DESCRIPTOR: Alternate CSE, to allow Amvac to be a
producer [REDACTED]

DATA REVIEWS: [REDACTED] sup [REDACTED]

HED: RCAB _____ TB _____ RCB _____ DRES _____

OREB _____

EFED: IO _____ EEB _____ EFGWB _____ ERCB _____

BEAD: ACB _____ BAB _____ EAB _____

RSB: PCRS _____ PRS _____ PCS _____

PM Team: Carl _____ Paul _____ Vern _____ Bill _____

FINAL ACTION: RESPONSE CODE: _____ RESPONSE DATE: ____/____/____

75-DAY RESPONSE: YES _____ NO _____ MOS: (1) CITE ALL

CRP: YES _____ NO _____ (4) NOT APPLICABLE

RESTRICTED USE: YES _____ NO _____ (8) SELECTIVE

EXCLUSIVE USE: YES _____ NO _____

MANUFACTURING USE: YES _____ NO _____

CONDITIONAL REGISTRATION/UNCONDITIONAL REGISTRATION

NOTES: _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 15 1998

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Jon C. Wood
Amvac Chemical Corporation
2110 Davie Avenue
City of Commerce, California 90040

Subject: Conditions of continued registration for the following products

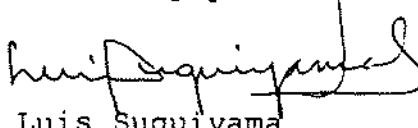
<u>EPA Reg. No.</u>	<u>Product Name</u>
5481-66	Alco Olive Stop
5481-129	Fruit Fix Concentrate 200
5481-130	Fruit Fix Super Concentrate
5481-219	1-Naphthaleneacetic Acid
5481-337	Alco Vitamin B-1 Hormone Concentrate
5481-413	K-Salt Fruit Fix 800
5481-414	K-Salt Fruit Fix 200
5481-426	Amid-Thin W
5481-428	Fruitone-N
5481-430	Technical Naphthaleneacetic Acid
5481-431	Technical 1-Naphthaleneacetamide

Dear Mr. Wood,

The memorandum of agreement dated November 19, 1998 and identified as "Amvac Chemical Corporation - Proposal to EPA Regarding NAA Products" (including a replacement for page 4, to correct an error, that was delivered by facsimile on December 3, 1998), together with the following attachments to this memorandum: 1) entitled "STANDARD OPERATING PROCEDURE: Registered Sources of Active Ingredients" and dated November 19, 1998, 2) entitled "STANDARD OPERATING PROCEDURE: Importation of NAA Products" and dated November 19, 1998, and 3) entitled "STANDARD OPERATING PROCEDURE: Quality Assurance/Quality Control" and dated November 19, 1998, required that reports be made to Agency headquarters in the Washington, D.C. area, as well as to the appropriate EPA Region, concerning the importation of shipments

of Naphthaleneacetic Acid (NAA) and its salts into the United States. The reports sent to Agency headquarters were specifically required to be sent to the "EPA Product Manager responsible for NAA pesticide products". Since then a change has occurred, namely that registration responsibility for Naphthaleneacetic Acid and its salts has been transferred from Registration Division to Biopesticides and Pollution Prevention Division (BPPD). The transition period for completing this transfer has also passed. Therefore, correspondence that is sent to EPA headquarters in the Washington, D.C. area concerning the importation of shipments of Naphthaleneacetic Acid and its salts into the United States should from now on be sent to Denise Greenway, Biochemical Pesticides Branch, Biopesticides and Pollution Prevention Division (7511C), the rest of the address remaining the same.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Luis Suguiyama", written over a horizontal line.

Luis Suguiyama
Chief
Fungicide Branch
Registration Division (7505C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 11 1998

Jon C. Wood
Amvac Chemical Corporation
2110 Davie Avenue
City of Commerce, California 90040

Subject: Conditions of continued registration for the following products

<u>EPA Reg. No.</u>	<u>Product Name</u>
5481-66	Alco Olive Stop
5481-129	Fruit Fix Concentrate 200
5481-130	Fruit Fix Super Concentrate
5481-219	1-Naphthaleneacetic Acid
5481-337	Alco Vitamin B-1 Hormone Concentrate
5481-413	K-Salt Fruit Fix 800
5481-414	K-Salt Fruit Fix 200
5481-426	Amid-Thin W
5481-428	Fruitone-N
5481-430	Technical Naphthaleneacetic Acid
5481-431	Technical 1-Naphthaleneacetamide

Dear Mr. Wood,

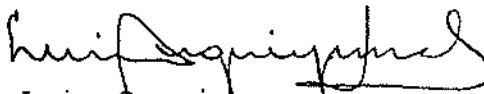
Pursuant to Agency concerns about the fitness of Amvac Chemical Corporation (hereinafter "Amvac") to hold the registration of the subject products, Amvac voluntarily proposed the conditions of registration that are contained in the memorandum of agreement dated November 19, 1998 and identified as "Amvac Chemical Corporation - Proposal to EPA Regarding NAA Products" (including a replacement for page 4, to correct an error, that was delivered by facsimile on December 3, 1998), together with the following attachments to this memorandum: 1) entitled "STANDARD OPERATING PROCEDURE: Registered Sources of Active Ingredients" and dated November 19, 1998, 2) entitled "STANDARD OPERATING PROCEDURE: Importation of NAA Products" and dated November 19, 1998, and 3) entitled "STANDARD OPERATING PROCEDURE: Quality Assurance/Quality Control" and dated November 19, 1998. These documents were submitted by Amvac's agent, Bergeson and Campbell, P.C., 1300 Eye Street, N.W., Suite 1000

West, Washington, D.C. 20005. The memorandum is "from" and initialed by Lynn L. Bergeson and Lisa M. Campbell. The memorandum and its three attachments, as identified above, are, in their entirety, claimed to be Confidential Business Information by Amvac. The conditions contained in these documents are acceptable to the Agency and are hereby imposed on the continued registration of each of the subject products for a period of three years from the date of this letter.

If these conditions are not complied with, the registration of each of the subject products will be subject to cancellation in accordance with FIFRA Section 6(e). Your release of any of these products into channels of trade constitutes acceptance of these conditions.

If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Luis Suguiyama", with a stylized flourish at the end.

Luis Suguiyama
Chief
Fungicide Branch
Registration Division (7505C)

attachment: The memorandum identified as "Amvac Chemical Corporation - Proposal to EPA Regarding NAA Products" and three Standard Operating Procedures attached to it

cc w/ attachment: EPA Regions 9 and 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 9 1996

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

W.F. Millar, III
Amvac Chemical Corporation
2110 Davie Avenue
City of Commerce, California 90040

Subject: Technical Naphthaleneacetic Acid ✓
EPA Registration Number 5481-430
Your two Alternate Confidential Statements of Formula
(CSF) dated April 23, 1996

Dear Mr. Millar,

The Alternate CSFs referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, are acceptable. A copy of the Alternate CSFs, dated April 23, 1996, have been placed in our file for the subject product.

If you have any questions about this letter, please contact John Bazuin at (703)305-7381.

Sincerely yours,

CS/
Cynthia L. Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

DATE OUT: 7/12/96

SUBJECT: PRODUCT CHEMISTRY REVIEW OF:
A MANUFACTURING-USE [] OR AN END-USE PRODUCT []
DP Barcode D22782P Reg. No. or File Symbol No. 5481-430
TO: (PM Team Reviewer) Cynthia Giles-Parker / John Baevin
PM Team No. 22
FROM: (Chemist/Date) Harold Podall
Product Chemistry Review Section
Registration Support Branch/RD (WH705W)
THRU: Harold Podall, Ph.D., Section Head
Registration Support Branch/RD (WH7505W)

SUMMARY OF INFORMATION REVIEWED AND FINDINGS

AMVAC Chem Corp. is applying to register an alternate
source of tech grade 1-naphthalene acetic acid produced by
[REDACTED] The CSF, Series 61 and 62
info submitted have been reviewed and are acceptable.
The alternate source is of comparable purity & identical
in purity to their other source [REDACTED] in [REDACTED]

[REDACTED]



AMVAC CHEMICAL CORPORATION TM

2110 DAVIE AVENUE, CITY OF COMMERCE, CALIFORNIA 90040
(213) 264-3910 FAX (213) 887-9221

22 April 1996
WFM 96-181

439983-00

Terri Stowe, PM-22
Registration Product Manager
Office of Pesticide Programs, 7505C
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Subject: Naphthaleneacetic Acid (5481-219, 5481-430)
Registration of Alternate Supplier of Technical NAA

Dear Terri:

AMVAC Chemical Corporation would like to register a second alternate supply of technical grade 1-naphthaleneacetic acid. The supplier is [REDACTED]. Enclosed is a Confidential Statement of Formula for each of the above two registration numbers, along with four copies of the following Series 61 and Series 62 reports which were used to support the CSFs:

1. "NAA: Product Identity and Composition of 1-Naphthaleneacetic Acid", AMVAC Study ING 013.2, issued 15 April, 1996. 43998301
2. "NAA: Analysis and Certification of Ingredients in 1-Naphthaleneacetic Acid", AMVAC Study PAN 013.2, issued 15 April 1996. 43998302

Three copies of each report (blue binders) contain confidential business information. The fourth copy (red binder) has the confidential business information removed and may be transferred to the public docket.

A previous submission on December 20, 1995 to register our first alternate source [REDACTED] did not make reference to product 5481-430. Enclosed with this submission is a CSF appropriate for the 5481-430 [REDACTED] combination.

In summary, there are now three suppliers of technical grade 1-naphthaleneacetic acid to AMVAC. They are [REDACTED], [REDACTED] and [REDACTED] and all have the same specification.

If you have any questions please contact me on (213) 526-2388.

Sincerely,

AMVAC Chemical Corporation

Rusty Millar

W. F. Millar, III
Manager, Regulatory Affairs

cc : Susan Jennings, 7508W, w/o enclosures

DP BARCODE: D227828

CASE: 003342
SUBMISSION: S504987

DATA PACKAGE RECORD
BEAN SHEET

DATE: 07/11/96
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION
RANKING : 0 POINTS ()
CHEMICALS: 056002 NAA

ACTION: 347 FRML CHG-UNREG SRC OF AI

95.0000%

ID#: 005481-00430 TECHNICAL NAPHTHALENEACETIC ACID

COMPANY: 005481 AMVAC CHEMICAL CORP

PRODUCT MANAGER: 22 CYNTHIA GILES-PARKER

703-305-5540

ROOM: CM2

229

PM TEAM REVIEWER: JOHN BAZUIN

703-305-6117

ROOM: CM2

261

RECEIVED DATE: 04/25/96

DUE OUT DATE: 08/13/96

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 227828

EXPEDITE: Y

DATE SENT: 07/11/96

DATE RET.: / /

CHEMICAL: 056002 NAA

DP TYPE: 001 Submission Related Data Package

CSF: Y

LABEL: Y

ASSIGNED TO

DATE IN

DATE OUT

ADMIN DUE DATE: 09/19/96

DIV : RD

/ /

/ /

NEGOT DATE: / /

BRAN: RSB

/ /

/ /

PROJ DATE: / /

SECT: PCRS

/ /

/ /

REVR :

2. Port M 7/11/96

7/12/96

CONTR:

/ /

/ /

* * * DATA REVIEW INSTRUCTIONS * * *

Please review the CSFs and data which the registrant has submitted in support of registration of an alternative source of supply of NAA and indicate if the alternative source, alternative CSFs, and data are acceptable and, if not, why not.

Attached for this product are the pre-existing Basic CSF, the proposed new Alternate CSFs, and the data in support of the change.

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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PESTICIDE REGISTRATION ACTION TRACKING SYSTEM (PRAT)
CODING FORM

BAR CODE: 5504987 ID NUMBER: 5481-430 ACTION CODE: 347

PM: 22 REVIEWER: Bazuin DUE DATE: 8 / 13 / 96

DATE ON APPLICATION: 4 / 22 / 96

EPA RECEIVED DATE: 4 / 25 / 96

PM RECEIVED DATE: 5 / 8 / 96

APPLICANT: Amvac Chemical Corp.; W. F. Millar, III

CHEM CODE (1): 056002 CHEM: 1-Naphthalene acetic acid

CHEM CODE (2): _____ CHEM: _____

DESCRIPTOR: Alternate Formula; unregistered technical

RELATED ACTIONS: _____

DATA REVIEWS:

HED: RCAB _____ TB _____ RCB _____ DRES _____

OREB _____

EFED: IO _____ EEB _____ EFGWB _____ ERCB _____

BEAD: ACB _____ BAB _____ EAB _____

RSB: PCRS _____ PRS _____ PCS _____

PM Team: Carl _____ Paul _____ Vern _____ Bill _____

FINAL ACTION: RESPONSE CODE: _____ RESPONSE DATE: ____/____/____

75-DAY RESPONSE: YES _____ NO _____ METHOD OF SUPPORT:

CRP: YES _____ NO _____ (1) CITE ALL

RESTRICTED USE: YES _____ NO _____ (4) NOT APPLICABLE

EXCLUSIVE USE: YES _____ NO _____ (8) SELECTIVE

MANUFACTURING USE: YES _____ NO _____

REGISTRATION: CONDITIONAL _____ UNCONDITIONAL _____

DATA STILL REQUIRED:

GUIDELINE NO. _____ DATE DUE ____/____/____

GUIDELINE NO. _____ DATE DUE ____/____/____

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

MAY 06 1996

AMVAC CHEMICAL CORP
2110 DAVIE AVE
COMMERCE, CA 900401706

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 04/25/96. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

JUL 10 1995

I, James M. Stone, Product Manager, Fungicide-Herbicide Branch, Registration Division, Office of Prevention, Pesticides and Toxic Substances, U.S. Environmental Protection Agency, do hereby certify that the pesticide product listed below is currently registered with this Agency under the Federal Insecticide, Fungicide, and Rodenticide Act, and that the product may be sold and marketed in the United States of America for the uses indicated on the label.

The product registration listed below has been issued to:

Amvac Chemical Corporation
2110 Davie Avenue
City of Commerce, Calif. 90040

EPA Registration

Name of Product

5481-430

TECHNICAL NAPHTHALENEACETIC ACID,

IN WITNESS WHEREOF I have hereunto
set my hand and affixed the seal of
the U.S. ENVIRONMENTAL PROTECTION AGENCY
this 10th day of July A.D. 1995

James M. Stone

James M. Stone
Acting Product Manager #22
Fungicide-Herbicide Branch
Registration Division (7505C)



AMVAC CHEMICAL CORPORATION

2110 DAVIE AVENUE, CITY OF COMMERCE, CALIFORNIA 90040
(213) 264-3910 FAX (213) 887-9221

May 2, 1995
WFM 95-215

Sherada D. Hobgood, Program Specialist
Registration Support Branch, 7505W
U.S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Subject: Gold Seal Certification

Dear Ms. Hobgood:

Please forward to my attention five gold seal certificates on EPA letterhead stating that the following Amvac Product is registered with EPA.

TECHNICAL NAPHTHALENEACETIC ACID EPA REG. NO. 5481-430

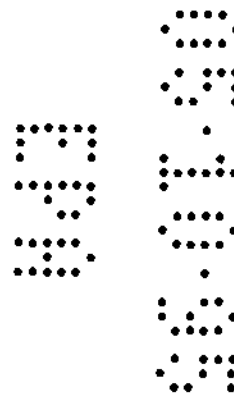
Please call me at 213-526-2388 if you have any questions. Thank you for your assistance.

Sincerely,

AMVAC CHEMICAL CORPORATION

W.F. Millar
Manager, Regulatory Affairs

WFM:kal





AMVAC CHEMICAL CORPORATION

2110 DAVIE AVENUE, CITY OF COMMERCE, CALIFORNIA 90040
(213) 264-3910 FAX (213) 887-9221

July 26, 1995
WFM 95-322

5481-430

Susan Jennings, Review Manager
Special Review & Reregistration Division, 7508W
Office of Pesticide Programs
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460-0001

Subject: NAA Data Call-Ins of 1990, Case No. 0379
DCI 56002 Naphthaleneacetic Acid
DCI 56003 Naphthaleneacetic Acid, Potassium Salt
DCI 56007 Naphthaleneacetic Acid, Sodium Salt
DCI 56004 Naphthaleneacetic Acid Ammonium salt
DCI 56008 Naphthaleneacetic Acid, Ethyl Ester
DCI 56001 Naphthaleneacetamide

Dear Susan:

Amvac requests a time extension for the Tier II Seed Germination and Seedling Emergence Study on NAA, Potassium Salt, EPA Guideline 123-(a).

EPA required Amvac to repeat Tier II Seed Germination and Seedling Emergence studies on NAA, potassium salt and NAA, ammonium salt. Amvac has placed the repeat studies at Landis International and reports are due to EPA on August 1 and August 21 for the potassium and ammonium salts, respectively.

Dr. Wayne Harnish, the study director for both these studies, has just informed us (see enclosed letter) that he is having difficulty in obtaining No Observable Effect Levels, in spite of having already repeated the tests at different concentrations. Testing is finally complete for the study with NAA, ammonium salt and we are confident a final report will be issued prior to the August 21 due date. However, as additional testing still needs to be performed with the potassium salt, the study will not be completed prior to the August 1 due date. Assuming that the new dose levels are successful, a final report is expected from Landis during the middle of September. Amvac therefore requests a time extension until September 30, 1995 for the potassium salt study.

If you have any questions, please contact me at (213) 526-2388.

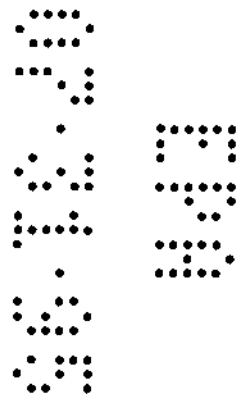
Sincerely,

AMVAC CHEMICAL CORPORATION

Rusty Millar

W. F. Millar
Manager, Regulatory Affairs

cc [REDACTED]





LANDIS INTERNATIONAL, INC.
R & D Management

July 25, 1995

VIA FEDERAL EXPRESS

Mr. Jeramy Heath
AMVAC CHEMICAL CORPORATION
2110 Davies Ave.
City of Commerce, CA 90040

SUBJECT: AMMONIUM SALT FRUIT FIX SUPER CONCENTRATE 800 TIER II NON-TARGET PLANT HAZARD-EVALUATION (PROTOCOL NO. 22925B007) AND POTASSIUM SALT FRUIT FIX 880 TIER II NON-TARGET PLANT HAZARD-EVALUATION (PROTOCOL NO. 22925B008)

Dear Mr. Heath:

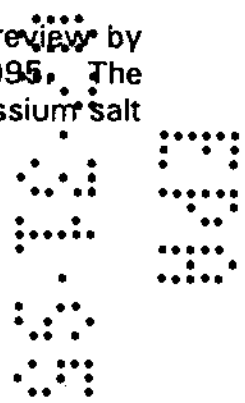
An extension of the deadline for submission of the final reports for the subject studies is needed. We are unable to meet the study deadlines because of difficulties in establishing dosage response data in several crop species that produces an no observed effect level (NOEL). For NAA, ammonium salt we have conducted two continuation tests using higher dosage rates in a effort to establish an NOEL. All of the data for that product are now collected and additional time is needed to prepare the draft and final report. The draft report is currently being written.

NAA, potassium salt test have also been continued to establish the NOEL on several crops. A continuation test for seedling emergence of tomato is currently underway and the final data will be taken on August 15, 1995.

I anticipate that the draft ammonium salt report will be ready for your review by August 1, 1995 and the potassium salt draft report by August 30, 1995. The ammonium salt report could be in final form by mid-August and the potassium salt report by mid-September.

Sincerely,

Wayne N. Harnish, Ph. D.
Study Director





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

AUG 2 1991

H. R. McLane
Authorized Agent for
Amvac Chemical Corp.
H. R. McLane, Inc.
7210 Red Road - Suite 206
Miami, FL 33143-5321

Dear Mr. McLane:

SUBJECT: Review of Labeling Amendments for Deleted Uses

1-Naphthaleneacetic Acid Sodium Salt
EPA Reg. No. 5481-218
1-Naphthaleneacetic Acid
EPA Reg. No. 5481-219
Technical Naphthaleneacetic Acid
EPA Reg. No. 5481-430 ✓
Technical 1-Naphthaleneacetamide
EPA Reg. No. 5481-431
Technical 1-Naphthaleneacetic Acid Sodium Salt
EPA Reg. No. 5481-432
Technical 1-Naphthaleneacetic Acid Ethyl Ester
EPA Reg. No. 5481-433
Your Letters Dated October 14, 1993

The labeling for each product referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling for each of the products above must be submitted prior to releasing the product for shipment. Enclosed are copies of the stamped labels for your records.

1. Modify the ENVIRONMENTAL HAZARDS section of the labels to read:

"Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact our State Water Board or Regional Office of the EPA. Do not contaminate water when disposing of equipment washwaters."

2. Under the signal words of the labels, correct the Spanish instructions to read "Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle."

From each label where it appears, you must delete the statement, "The Environmental Protection Agency forbids the use of this product on Pinapples!"

3. You may want to include the following statement on all of your labels under the DIRECTIONS FOR USE section:

"Formulators using this product are responsible for obtaining EPA registrations for their formulated products."

Please refer to PR Notices 91-4 and 91-8 for guidance.

4. Correct the spelling errors in the the LIMITED WARRANTY section of your labels.
5. The following modifications apply to specific products:
 - a. For 5481-219, include the following statement under the DIRECTIONS FOR USE section: "Formulation into a plant growth regulator is prohibited for use on pineapples."
 - b. For 5481-431 and 5481-432, modify the STORAGE AND DISPOSAL section to follow the format on the 5481-430 label, i.e. separate the STORAGE, PESTICIDE DISPOSAL, and the CONTAINER DISPOSAL sections under this heading.
 - c. For 5481-430, 5481-431, and 5481-432, add the following statement under the STORAGE AND DISPOSAL section: "Do not contaminate water, food or feed by storage or disposal."
 - d. For 5481-433, please note that your request dated 10/14/93 to delete the use of olives for this product has been rescinded per your letter dated 04/05/94. Please refer to the Agency letter to you dated 05/09/94 for specific comments regarding this product. However, it has been brought to our attention by the Special Review and Reregistration Division that you are not supporting the olive use for reregistration.

You must clarify this matter immediately and comply with SRRD data requirements in support of the use on olives if applicable.

Sincerely yours,

/s/

Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division (7505C)

Enclosures

cc: Susan Jennings

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY

ACCEPTED

with COMMENTS

EPA Letter Dated:

2

2 Federal Insecticide
and Rodenticide Act
for the pesticide
under EPA Reg. No.

5481-430

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid 95.0%

INERT INGREDIENTS: 5.0%

Total 100.0%

EPA REG. NO. 5481-430

EPA Est. No. 5481-CA-1

KEEP OUT OF REACH OF CHILDREN
DANGER

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE.
WEAR SAFETY GOGGLES WHEN HANDLING.

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

Danger: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidance contact your regional office of the EPA.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following:

LIMITED WARRANTY:

AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with the directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. AMVAC NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTY, EXPRESS OR IMPLIED. AMVAC EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE, OR ANY OTHER WARRANTY OF QUALITY OR PERFORMANCE.

LIMITED WARRANTY (Cont.)

THIS WARRANTY DOES NOT EXTEND TO, AND THE USER SHALL BE SOLELY RESPONSIBLE FOR, ANY LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THIS LABEL'S DIRECTIONS, WARNINGS OR CAUTIONS. USER'S EXCLUSIVE REMEDY AND AMVAC'S OR SELLERS' EXCLUSIVE LIABILITY FOR ANY CLAIM, LOSS, DAMAGE, OR INJURY RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT, OR OTHERWISE SHALL BE LIMITED, AT AMVAC'S OPTION, TO REPLACEMENT OF, OR REPAYMENT OF THE PURCHASE PRICES FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL AMVAC OR SELLER BE LIABLE FOR SPECIAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneacetamide and only for those uses which are duly registered with the US EPA. Formulation into a plant growth regulator is prohibited for use on pineapples. Formulators using this product are responsible for obtaining EPA supplemental distributor registrations for their formulated products.

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely toxic. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner. (5481-430.PM4 / 10-15-93)

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY

1 - TRANSPORTATION: CHEMTREC 1-800-424-9300
2 - MEDICAL: HHS 1-800-228-5835 Ext. 189

Net Weight 50 Pounds

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. - LOS ANGELES, CA 900238 U.S.A.

[OPP-34050; FRL 4748-8]

**Notice of Receipt of Requests for
Amendments to Delete Uses in Certain
Pesticide Registrations**

AGENCY: Environmental Protection
Agency (EPA).

ACTION: Notice.

SUMMARY: In accordance with section 6(f)(1) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, EPA is issuing a notice of receipt of request for amendment by registrants to delete uses in certain pesticide registrations.

DATES: Unless a request is withdrawn, the Agency will approve these use deletions and the deletions will become effective on April 12, 1994.

FOR FURTHER INFORMATION CONTACT: By mail: James A. Hollins, Office of Pesticide Programs (7502C), Environmental Protection Agency, 401 M Street, SW., Washington, DC 20460. Office location for commercial courier delivery and telephone number: Room 216, Crystal Mall No. 2, 1921 Jefferson Davis Highway, Arlington, VA 22202, (703) 305-5761.

SUPPLEMENTARY INFORMATION:

I. Introduction.

Section 6(f)(1) of FIFRA provides that a registrant of a pesticide product may at any time request that any of its pesticide registrations be amended to delete one or more uses. The Act further provides that, before acting on the request, EPA must publish a notice of receipt of any such request in the Federal Register. Thereafter, the Administrator may approve such a request.

II. Intent to Delete Uses

This notice announces receipt by the Agency of applications from registrants to delete uses in the 13 pesticide registrations listed in the following Table 1. These registrations are listed by registration number, product names and the specific uses deleted. Users of these products who desire continued use on crops or sites being deleted should contact the applicable registrant before April 12, 1994 to discuss withdrawal of the applications for amendment. This 90-day period will also permit interested members of the public to intercede with registrants prior to the Agency approval of the deletion.

TABLE 1. — REGISTRATIONS WITH REQUESTS FOR AMENDMENTS TO DELETE USES IN CERTAIN PESTICIDE REGISTRATIONS

EPA Registration No.	Product Name	Delete From Label
000769-00221	Suregard Grain Protectant Dust	Rice, grain sorghum and field or garden seed
000769-00921	Science Benomyl 50W	Roses (field & greenhouse), flowers, ornamentals (field & greenhouse)
000802-00460	Miller's Malathion 5E	Apples, pears, plums, prunes, interior buildings, meat processing establishments, stored grain, stored field and garden seeds
005481-00218	1-Naphthaleneacetic Acid Sodium Salt	Ornamentals, cherries (sweet), citrus (oranges, tangelos, tangerines/mandarins, tangors), olives, quince
005481-00219	1-Naphthaleneacetic Acid	Apples, cherries (sweet), pears, olives, quinces, citrus (oranges, tangelos, tangerines/mandarins, tangors)
005481-00430	Technical Naphthaleneacetic Acid	Apples, pears
005481-00431	Technical 1-Naphthaleneacetamide	Olives
005481-00432	Technical 1-Naphthaleneacetic Acid Sodium salt	Olives
005481-00433	Technical 1-Naphthaleneacetic Acid Ethyl Ester	Olives
005905-00112	Cythion ULV Concentrate Insecticide	Safflower, soybeans, tomatoes, sugar beets
005905-00293	Cythion 25 WP	Cranberries, livestock, plums, apples, pears, alfalfa, clover, vetch, apricots, beans, broccoli, brussel sprouts, cauliflower, cabbage, kale, mustard greens, turnips, celery, lettuce, spinach, cherries, citrus, cucumbers, melons, eggplant, grapes, peaches, peas, peppers, potatoes, tomatoes, walnuts, prunes
008590-00228	Agway Malathion Insect Spray	Asparagus, dog & cat, quarters, melons, pumpkins, watermelons
051036-00033	Malathion 25W	Eggplant, broccoli, turnips, endive, carrots, radishes, cabbage, collards, cauliflower, mustard, tomatoes, strawberries, peppers, okra, beans, lettuce, cucumbers, citrus (oranges, limes, tangelos, lemons, kumquats & tangerines), peaches, peanuts, warehouse peanut spray

The following Table 2, includes the names and addresses of record for all registrants of the products in Table 1, in sequence by EPA company number.

TABLE 2. — REGISTRANTS REQUESTING AMENDMENTS TO DELETE USES IN CERTAIN PESTICIDE REGISTRATIONS

Company No.	Company Name and Address
000769	Sureco, Inc., P.O. Box 938, Fort Valley, GA 31030.
000802	The Chas. H. Lilly Co., 7737 NE Killingsworth, Portland, OR 97218.
005481	Amvac Chemical Corp., 4100 E. Washington Blvd., Los Angeles, CA 90023.
005905	Helena Chemical Co., 6075 Poplar Ave., Suite 500, Memphis, TN 38119.
008590	Agway, Inc., c/o Universal Cooperatives, Inc., P.O. Box 460, Minneapolis, MN 55440.
051036	Micro Flo Co., P.O. Box 5498, Lakeland, FL 33807.

III. Existing Stocks Provisions

The Agency has authorized registrants to sell or distribute product under the previously approved labeling for a period of 18 months after approval of the revision, unless other restrictions have been imposed, as in special review actions.

List of Subjects

Environmental protection, Pesticides and pests, Product registrations.

Dated: December 21, 1993.

Douglas D. Campt,
Director, Office of Pesticide Programs.

Doc. 94-378 Filed 1-11-94; 8:45 am

MAILING CODE 6580-60-F



H. R. McLANE, INC.

7210 Red Road, Suite 206 - Miami, Florida 33143-5321
Phone & FAX - 305 661 1706
Chemical Consultants in EPA Regulatory Affairs
FIFRA Licensing & Registrations

October 15, 1993

Ms. Cynthia Giles-Parker PM-22
Document Processing Desk (AMEND)
Environmental Protection Agency (H7505C)
401 "M" Street S. W.
Washington D.C. 20460

Registrant: AMVAC CHEMICAL CORPORATION/EPA Est. No. 5481.
1400 East Washington Blvd. - Los Angeles CA 90023
Subject: 1. Amendments to NAA Products/Delete Uses.
2. Revise Corporate Product Warranty Statement.
3. Add new Emergency Telephone numbers to label copy.

Products:

1. EPA Reg. No. 5481-218 1-Naphthaleneacetic Acid Sodium Salt
2. EPA Reg. No. 5481-219 1-Naphthaleneacetic Acid
3. EPA Reg. No. 5481-430 Technical Naphthaleneacetic Acid
4. EPA Reg. No. 5481-431 Technical 1-Naphthaleneacetamide
5. EPA Reg. No. 5481-432 Technical 1-Naphthaleneacetic Acid Sodium Salt
6. EPA Reg. No. 5481-433 Technical 1-Naphthaleneacetic Acid Ethyl Ester

Dear Ms. Giles-Parker:

The above 5 product labels are being amended to delete certain uses. These uses are being deleted due to lack of data support by the Registrant.

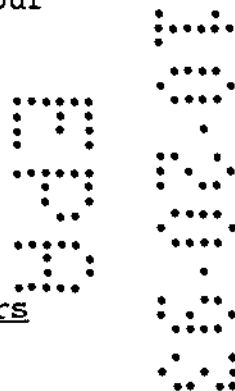
For the exact details of each amendment refer to the EPA form #8570-1 (attached) which accompanies this letter.

Please stamp ACCEPTED on one copy of each label and return for our further use.

If you have any questions, please call 305-661-1706 for a discussion of the matter. Thank you for your cooperation in this matter.

Sincerely
H. R. McLANE, INC.

H. R. McLane, Authorized Agent for
Jeannie K. Smith, Director, Regulatory Affairs
AMVAC CHEMICAL CORPORATION
HRM/nb/cc/JKS/ACC



Yellow - Applicant copy

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch; PM-223, U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). [If not exempted by 40 CFR 152.81 (b) (4)];
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper or a mockup of the proposed label. If prepared as a mockup, it should be constructed in such a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended registration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Specify the net contents of all retail containers for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.



United States Environmental Protection Agency
Washington, DC 20460

**CERTIFICATION WITH RESPECT TO
DATA COMPENSATION REQUIREMENTS**

Form Approved

OMB No. 2070-0106

Approval Expires 12-31-92

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

Please fill in blanks below.

OPP ID 202004

Company Name AMVAC CHEMICAL CORPORATION	Company Number 5481-430
Chemical Name NAA Product Name: TECHNICAL NAPHTHALENEACETIC ACID	EPA Chemical Number #056002 CAS [86-87-3]

I Certify that:

- For each study cited in support of registration or reregistration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) that is an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter to cite that study.
- That for each study cited in support of registration or reregistration under FIFRA that is NOT an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter, or I have notified in writing the company(ies) that submitted data I have cited and have offered to: (a) Pay compensation for those data in accordance with sections 3(c)(1)(D) and 3(c)(2)(D) of FIFRA; and (b) Commence negotiation to determine which data are subject to the compensation requirement of FIFRA and the amount of compensation due, if any. The companies I have notified are: (check one)

☒ All companies on the data submitters' list for the active ingredient listed on this form (Cite-All Method or Cite-All Option under the Selective Method). (Also sign the General Offer to Pay below.)

☐ The companies who have submitted the studies listed on the back of this form or attached sheets, or indicated on the attached "Requirements Status and Registrants' Response Form."

- That I have previously complied with section 3(c)(1)(D) of FIFRA for the studies I have cited in support of registration or reregistration under FIFRA.

Signature 	Date OCT 14 1993
Name and Title (Please Type or Print) H. R. MCLANE, INC. By H. R. McLane Authorized Agent for/Jeanne K. Smith, Dir. Regulatory Affairs	

GENERAL OFFER TO PAY: I hereby offer and agree to pay compensation to other persons with regard to the registration or reregistration of my products, to the extent required by FIFRA sections 3(c)(1)(D) and 3(c)(2)(D).

Signature 	Date OCT 14 1993
Name and Title (Please Type or Print) H. R. MCLANE, INC. By H. R. McLane Authorized Agent for/Jeanne K. Smith, Dir. Regulatory Affairs	

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[OPP-34050; FRL 4748-9]

**Notice of Receipt of Requests for
Amendments to Delete Uses in Certain
Pesticide Registrations**

AGENCY: Environmental Protection
Agency (EPA).

ACTION: Notice.

SUMMARY: In accordance with section 6(f)(1) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, EPA is issuing a notice of receipt of request for amendment by registrants to delete uses in certain pesticide registrations.

DATES: Unless a request is withdrawn, the Agency will approve these use deletions and the deletions will become effective on April 12, 1994.

FOR FURTHER INFORMATION CONTACT: By mail: James A. Hollins, Office of Pesticide Programs (7502C), Environmental Protection Agency, 401 M Street, SW., Washington, DC 20460. Office location for commercial courier delivery and telephone number: Room 216, Crystal Mall No. 2, 1921 Jefferson Davis Highway, Arlington, VA 22202, (703) 305-5761.

SUPPLEMENTARY INFORMATION:

I. Introduction

Section 6(f)(1) of FIFRA provides that a registrant of a pesticide product may at any time request that any of its pesticide registrations be amended to delete one or more uses. The Act further provides that, before acting on the request, EPA must publish a notice of receipt of any such request in the Federal Register. Thereafter, the Administrator may approve such a request.

II. Intent to Delete Uses

This notice announces receipt by the Agency of applications from registrants to delete uses in the 13 pesticide registrations listed in the following Table 1. These registrations are listed by registration number, product names and the specific uses deleted. Users of these products who desire continued use on crops or sites being deleted should contact the applicable registrant before April 12, 1994 to discuss withdrawal of the applications for amendment. This 90-day period will also permit interested members of the public to intercede with registrants prior to the Agency approval of the deletion.

TABLE 1. — REGISTRATIONS WITH REQUESTS FOR AMENDMENTS TO DELETE USES IN CERTAIN PESTICIDE REGISTRATIONS

EPA Registration No.	Product Name	Delete From Label
000769-00221	Suregard Grain Protectant Dust	Rice, grain sorghum and field or garden seed
000769-00921	Science Benomyl 50W	Roses (field & greenhouse), flowers, ornamentals (field & greenhouse)
000802-00460	Miller's Malathion SE	Apples, pears, plums, prunes, interior buildings, meat processing establishments, stored grain, stored field and garden seeds
✓ 005481-00218	1-Naphthaleneacetic Acid Sodium Salt	Ornamentals, cherries (sweet), citrus (oranges, tangelos, tangerines/mandarins, tangors), olives, quince
✓ 005481-00219	1-Naphthaleneacetic Acid	Apples, cherries (sweet), pears, olives, quinces, citrus (oranges, tangelos, tangerines/mandarins, tangors)
✓ 005481-00430	Technical Naphthaleneacetic Acid	Apples, pears
✓ 005481-00431	Technical 1-Naphthaleneacetamide	Olives
✓ 005481-00432	Technical 1-Naphthaleneacetic Acid Sodium salt	Olives
✓ 005481-00433	Technical 1-Naphthaleneacetic Acid Ethyl Ester	Olives
005905-00112	Cythion ULV Concentrate Insecticide	Safflower, soybeans, tomatoes, sugar beets
005905-00293	Cythion 25 WP	Cranberries, livestock, plums, apples, pears, alfalfa, clover, vetch, apricots, beans, broccoli, brussel sprouts, cauliflower, cabbage, kale, mustard greens, turnips, celery, lettuce, spinach, cherries, citrus, cucumbers, melons, eggplant, grapes, peaches, peas, peppers, potatoes, tomatoes, walnuts, prunes
008590-00228	Agway Malathion Insect Spray	Asparagus, dog & cat, quarters, melons, pumpkins, watermelons
051036-00033	Malathion 25W	Eggplant, broccoli, turnips, endive, carrots, radishes, cabbage, collards, cauliflower, mustard, tomatoes, strawberries, peppers, okra, beans, lettuce, cucumbers, citrus (oranges, limes, tangelos, lemons, kumquats & tangerines), peaches, peanuts, warehouse peanut spray

The following Table 2. includes the names and addresses of record for all registrants of the products in Table 1. in sequence by EPA company number.

TABLE 2. — REGISTRANTS REQUESTING AMENDMENTS TO DELETE USES IN CERTAIN PESTICIDE REGISTRATIONS

Company No.	Company Name and Address
000769	Sureco, Inc., P.O. Box 938, Fort Valley, GA 31030.
00802	The Chas. H. Lilly Co., 7737 NE Killingsworth, Portland, OR 97218.
05481	Amvac Chemical Corp., 4100 E. Washington Blvd., Los Angeles, CA 90023.
05905	Helena Chemical Co., 6075 Poplar Ave., Suite 500, Memphis, TN 38119.
008590	Agway, Inc., c/o Universal Cooperatives, Inc., P.O. Box 460, Minneapolis, MN 55440.
051036	Micro Flo Co., P.O. Box 5498, Lakeland, FL 33807.

III. Existing Stocks Provisions

The Agency has authorized registrants to sell or distribute product under the previously approved labeling for a period of 18 months after approval of the revision, unless other restrictions have been imposed, as in special review actions.

List of Subjects

Environmental protection, Pesticides and pests, Product registrations.

Dated: December 21, 1993.

Douglas D. Camp, Jr.

Director, Office of Pesticide Programs.

(FR Doc. 94-378 Filed 1-11-94; 8:45 am)

BILLING CODE 5500-60-F



AMVAC CHEMICAL CORPORATION

2110 DAVIE AVENUE, CITY OF COMMERCE, CALIFORNIA 90040
(213) 264-3910 FAX (213) 887-9221

October 28, 1993

Certified Mail
P 306 772 359

Susan Jennings, Review Manager
Special Review & Reregistration Division
Office of Pesticide Programs (H7508W)
US Environmental Protection Agency
401 M Street, SW
Washington, DC 20460-0001

Subject: NAA Data Call-In(s) of 1990, Case Number 0379
DCI 56002 Naphthaleneacetic Acid (H+)
DCI 56003 Naphthaleneacetic Acid, Potassium Salt (K+)
DCI 56007 Naphthaleneacetic Acid, Sodium Salt (Na+)
DCI 56004 Naphthaleneacetic Acid, Ammonium Salt (NH₄+)
DCI 56008 Naphthaleneacetic Acid, Ethyl Ester (OEt)
DCI 56001 Naphthaleneacetamide (-NH₂)

Dear Susan:

To update the Agency on the developments in satisfying the requirements of the data call-in notices, we offer the attached annual progress report.

In an earlier conversation, you indicated that our technical labels needed to be revised to be in compliance with the crops that we propose to support through residue testing. On October 15, 1993, such a submission was made to the NAA product manager, Cynthia Giles-Parker PM-22, amending the technical labels as appropriate.

Some of the toxicity studies with ethyl ester and acetamide are past due. The primary reason for this delay is that we wish to receive the Agency's response to the residue waiver requests for ethyl ester and acetamide. Should these waivers be denied, Amvac may, from an economical standpoint, choose not to support the continued registration of ethyl ester and acetamide. Therefore, we formally request a time extension for the toxicity testing until responses are received for the residue testing waivers. At such time as these responses are received, Amvac will, within 30 days, provide to the Agency our intentions for performing the toxicity testing. Of secondary importance is our inability to obtain test material of the proper purity. Our registered source of acetamide and ethyl ester, [REDACTED] is in the process of reinstating their EPA establishment number. Once the reinstatement is final, we will be in a position to obtain test material should it be required.

Should you have any questions, please telephone me at 213/526-2388. Thank you.

Sincerely,

AMVAC CHEMICAL CORPORATION

Jeannie K. Smith
Jeannie K. Smith

Administrator, Regulatory Affairs

cc: Cynthia Giles-Parker PM-22, Registration Division (H7505C)

AMVAC CHEMICAL CORPORATION
4100 E. WASHINGTON BLVD.
LOS ANGELES, CA 90023

NAA DATA CALL-IN(S) UPDATE
October 28, 1993

71-2(a)	Acute Avian Quail (Submitted) Acetamide Ethyl Ester	MRID Nos. 42584201 42584202
72-1(a)	Fish Toxicity, Bluegill (Submitted) Ethyl Ester	MRID No. 42498101
72-2(a)	Invertebrate Toxicity (Submitted) Ethyl Ester	MRID No. 42470801
81-1	Acute Oral (Submitted) Acetamide	MRID Nos. 247584, 247606
81-2	Acute Dermal (Submitted) Acetamide	MRID Nos. 247584, 247606
81-3	Acute Inhalation (Submitted) Acetamide	MRID Nos. 247584, 247606
81-4	Primary Eye Irritation (Submitted) Acetamide	MRID Nos. 247584, 247606
81-5	Primary Dermal Irritation (Submitted) Acetamide & Ethyl Ester	MRID Nos. 247584, 247606
81-6	Dermal Sensitization Ethyl Ester (Submitted) Acetamide	247583 (Accession No.) See Explanation Below

We would like to receive the Agency response to the data waiver request for acetamide residue testing. Should the waiver be denied, Amvac may from a financial standpoint choose not to continue to support the registrations for acetamide.

82-1(a)	9D Day Rat Acetamide & Ethyl Ester	Requested Waiver
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A waiver request for this requirement for both ethyl ester and acetamide was submitted to the Agency. No response received to date.

82-1(b)	90 Day Dog Acetamide & Ethyl Ester	Requested Waiver
---------	---------------------------------------	------------------

A waiver request for this requirement for both ethyl ester and acetamide was submitted to the Agency. No response received to date.

82-2	21 Day Dermal Sodium Salt Acetamide & Ethyl Ester	Exxon Biomedical See Explanation Below
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The study (No. 1349108) with sodium salt is underway at Exxon and a copy of the protocol as well as the study schedule are attached. The in-life phase of the report is complete and additional histopathology is presently being done. We anticipate submitting this study report to the Agency during the first quarter of 1994.

We would like to receive the Agency response to the data waiver requests for acetamide and ethyl ester residue testing. Should the waivers be denied, Amvac may from a financial standpoint choose not to continue to support the registrations for acetamide and ethyl ester.

83-1(a) Chronic Feeding, Rat See 83-5
 Sodium Salt

This data requirement is being satisfied in combination with the Rat Oncogenicity study 83-2(a) requirement, under guideline 83-5, Chronic Toxicity/Oncogenicity in the Rat.

83-1(b) Chronic Feeding, Dog Bio-Research
 Sodium Salt

This study (number 85212) is underway at Bio-Research Laboratories, Ltd. in Quebec, Canada. A copy of both the protocol and study schedule are attached for your reference. Note that the target date for completion of the draft report is the first quarter of 1995.

A preliminary study (number 85211, guideline 82-1(b)), 13 Week Oral (Capsule) Toxicity study was performed by Bio-Research. On July 14, 1993 notification to Karen Samek of the Agency was submitted under 6(a)(2) of potential adverse findings. This notification was assigned MRID 42852601. On October 21, 1993, the final report was submitted to the Agency under 6(a)(2). To date, no MRID number has been assigned to the preliminary study.

83-2(a) Oncogenicity in the Rat See 83-5

This data requirement is being satisfied in combination with the Rat Feeding study 83-1(a) requirement, under guideline 83-5, Chronic Toxicity/Oncogenicity in the Rat.

83-4 2 Generation Reproduction, Rat Exxon Biomedical
 Sodium Salt

This study is underway at Exxon Bio-Medical Laboratories in New Jersey under study number 134935. A copy of both the protocol and study schedule are attached for your reference. Note that the target date for the draft report is the first quarter of 1995.

A preliminary study (number 134933), Multi-Generation Reproduction Toxicity Range Finding study in Rats was performed by Exxon Biomedical Sciences. The draft report is in preparation and will be submitted to the Agency in the first quarter of 1994.

83-5 Chronic Tox/Oncogenicity, Rat Exxon Biomedical
 Sodium Salt

This study is underway at Exxon Bio-Medical Laboratories in New Jersey under study number 134970B. A copy of both the protocol and study schedule are attached for your reference. Note that the target date for the draft report is the second quarter of 1996.

A preliminary study (number 134970A, EPA Guideline B2-1(a)), 90 Day Dietary Toxicity Study in Rats with NAA Sodium Salt was performed by Exxon Biomedical Sciences. On May 5, 1993 notification to Karen Samek of the Agency was submitted under 6(a)(2) of potential adverse findings. We have no receipt of a MRID to this 6(a)(2) notification. The study report was submitted to the Agency on September 16, 1993 and was assigned MRID 42932601.

84-2(a) Gene Mutation, Ames See Explanation Below
 Acetamide & Ethyl Ester

We would like to receive the Agency response to the data waiver requests for acetamide and ethyl ester residue testing. Should the waivers be denied, Amvac may from a financial standpoint choose not to continue to support the registrations for acetamide and ethyl ester.

84-2(b) Structural Chromosome Aberration See Explanation Below
 Acetamide & Ethyl Ester

We would like to receive the Agency response to the data waiver requests for acetamide and ethyl ester residue testing. Should the waivers be denied, Amvac may from a financial standpoint choose not to continue to support the registrations for acetamide and ethyl ester.

84-4(a) Other Genotoxic Effects See Explanation Below
 Acetamide & Ethyl Ester

We would like to receive the Agency response to the data waiver requests for acetamide and ethyl ester residue testing. Should the waivers be denied, Amvac may from a financial standpoint choose not to continue to support the registrations for acetamide and ethyl ester.

85-1 General Metabolism Requested Waiver
 Acetamide & Ethyl Ester

A waiver request for this requirement for both ethyl ester and acetamide was submitted to the Agency. No response received to date.

122-1(a) Seed Germination (Tier I) (Submitted) MRID Nos.
 Ammonium Salt 42589901
 Potassium Salt 42584203

122-1(b) Vegetative Vigor (Tier I) (Submitted) MRID Nos.
 Ammonium Salt 42564201
 Potassium Salt 42564202

According to the Agency's 9/14/93 review, peanuts must be retested with ammonium salt. On October 4, 1993, Amvac submitted additional information requesting the Agency re-review the results. We also requested that if the Agency still felt retesting was necessary that another plant species be substituted for peanuts. To date we have not received a response.

In the same 9/14/93 review by the Agency, it was stated that tier II testing was triggered by the potassium salt study. On October 4, 1993, Amvac committed to performing tier II testing for the tomato with potassium salt and requested the Agency advise if tier II testing is required for all plant species. To date we have not received a response.

122-2 Aquatic Plant Growth (Tier I) (Submitted) MRID Nos.
 Ammonium Salt 42582203
 Potassium Salt 42582201

123-1(a) Seed Germination (Tier II) (Submitted) MRID Nos.
 Ammonium Salt 42589901
 Potassium Salt 42584203

123-1(b)	Vegetative Vigor (Tier II) Potassium Salt	Landis
	The tomato trial has been placed at Landis International, Inc. and is tentatively scheduled for submission to the Agency in March 1994.	
123-2	Aquatic Plant Growth (Tier II) (Submitted) Ammonium Salt Potassium Salt	MRID Nos. 42582204 42582202
171-4(a)	NOR, Plants All	Requested Waiver
	A waiver request for this data requirement has been submitted. No response from the Agency to date.	
171-4(b)	NOR, Livestock All	Requested Waiver
	A waiver request for this data requirement has been submitted. No response from the Agency to date.	
171-4(e)	Storage Stability Potassium & Sodium Salts Acid, Ammonium Salt & Ethyl Ester	To Be Developed Requested Waiver
	We plan to develop storage stability data for potassium and sodium salt. A waiver request was submitted for the acid, ammonium salt and ethyl ester. No response from the Agency to date.	
171-4(k)	Crop Trials Apples Potassium Salt, Acetamide & Ethyl Ester Sodium Salt Ammonium Salt	Submitted 40884401 (MRID No.) To Be Developed Requested Waiver
	Apples: Submission was made by RPAC in 1988 for the potassium salt, acetamide and ethyl ester. Is the review for this submission complete?	
	Olives Potassium Salt Ammonium Salt	To Be Developed Requested Waiver
	Oranges Potassium Salt Ammonium Salt	To Be Developed Requested Waiver
	Pears Potassium Salt, Acetamide & Ethyl Ester Sodium Salt Ammonium Salt	Submitted 40884402 To Be Developed Requested Waiver
	Pears: Submission was made by RPAC in 1988 for the potassium salt, acetamide and ethyl ester. Is the review for this submission complete?	

page 5

	Tangerines	
	Potassium Salt	To Be Developed
	Ammonium Salt	Requested Waiver
171-4(e)	Processed Food	
	Apples	
	Potassium, Ammonium & Sodium Salts	Requested Waiver
	Acetamide	Requested Waiver
	Olives	
	Potassium & Ammonium Salts	Requested Waiver
	Oranges	
	Potassium & Ammonium Salts	Requested Waiver
	Waiver requests for this data requirement has been submitted. No response from the Agency to date.	



H. R. McLANE, INC.

7210 Red Road, Suite 206 - Miami, Florida 33143-5321

Phone & FAX - 305 661 1706

Chemical Consultants in EPA Regulatory Affairs

FIFRA Licensing & Registrations

GAVE TO J. HOLLINS
OF ISS/AMSD IN 10/22/93

October 15, 1993

Ms. Cynthia Giles-Parker PM-22
Document Processing Desk (AMEND)
Environmental Protection Agency (H7505C)
401 "M" Street S. W.
Washington D.C. 20460

Registrant: AMVAC CHEMICAL CORPORATION/EPA Est. No. 5481.

1400 East Washington Blvd. - Los Angeles CA 90023

Subject: 1. Amendments to NAA Products/Delete Uses.
2. Revise Corporate Product Warranty Statement.
3. Add new Emergency Telephone numbers to label copy.

Products:

1. EPA Reg. No. 5481-218 1-Naphthaleneacetic Acid Sodium Salt
2. EPA Reg. No. 5481-219 1-Naphthaleneacetic Acid
3. EPA Reg. No. 5481-430 Technical Naphthaleneacetic Acid
4. EPA Reg. No. 5481-431 Technical 1-Naphthaleneacetamide
5. EPA Reg. No. 5481-432 Technical 1-Naphthaleneacetic Acid Sodium Salt
6. EPA Reg. No. 5481-433 Technical 1-Naphthaleneacetic Acid Ethyl Ester

Dear Ms. Giles-Parker:

The above 5 product labels are being amended to delete certain uses. These uses are being deleted due to lack of data support by the Registrant.

For the exact details of each amendment refer to the EPA form #8570-1 (attached) which accompanies this letter.


Please stamp ACCEPTED on one copy of each label and return for our further use.

If you have any questions, please call 305-661-1706 for a discussion of the matter. Thank you for your cooperation in this matter.

Sincerely

H. R. McLane, Inc.

H. R. McLane, Authorized Agent for
Jeannie K. Smith, Director, Regulatory Affairs
AMVAC CHEMICAL CORPORATION
HRM/nb/cc/JKS/ACC

(A) 	United States Environmental Protection Agency Office of Pesticide Programs (H7505C) Washington, DC 20460 Amend Application for Pesticide:	<input type="checkbox"/> Registration	OPP Identifier Number: EXPEDITE 202004
		<input checked="" type="checkbox"/> Amendment	
		<input type="checkbox"/> Other	

Section I

1. Company/Product Number 5481-430	2. EPA Product Manager Cynthia G. Parker	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted OPP ID 202004
4. Company/Product (Name) TECHNICAL NAPHTHALENEACETIC ACID	PM# 22	
5. Name and Address of Applicant (Include ZIP Code) AMVAC CHEMICAL CORPORATION 4100 E. WASHINGTON BLVD. LOS ANGELES CA 90023 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. > --- N/A Product Name > --- N/A	

Section II

<input checked="" type="checkbox"/> Amendment - Explain below Add & Delete Uses.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - explain below.


Explanation: Use additional page(s) if necessary. (For section I and Section II.)

>
> This amendment adds the use on Ornamentals and deletes the use
> on Apples and Pears. Formulation instructions are also extended
> to list specific NAA Technical Grade Intermediate products that can be
> manufactured from this Technical NAA acid product.

Section III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		> <input type="checkbox"/> Metal ----->metal	
				> <input type="checkbox"/> Plastic ----->plastic	
				> <input type="checkbox"/> Glass ----->glass	
				> <input checked="" type="checkbox"/> Paper ----->paper	
				> <input checked="" type="checkbox"/> Other (Specify) ----->Fiber Drum	
* Certification must be submitted.					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) of Retail Container 50 lb. Bag 100 lb. Drum		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label Is Affixed To Product Adhesive/Glue		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other (_____)	

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name H. R. MCLANE, INC. By H. R. McLane;		Title Authorized Agent -----> Registrant ----->	
		Telephone No. (Include Area Code) 305-661-1706 213-526-2388	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Authorized Agent		
4. Typed Name Jeannie K. Smith, Dir. Reg. Affairs	5. Date OCT 14 1993		

216



United States Environmental Protection Agency
Washington, DC 20460

CERTIFICATION WITH RESPECT TO
DATA COMPENSATION REQUIREMENTS

Form Approved

OMB No. 2070-0106

Approval Expires 12-31-92

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

Please fill in blanks below.

OPP ID 202004

Company Name	Company Number
AMVAC CHEMICAL CORPORATION	5481-430
Chemical Name	EPA Chemical Number
NAA	#056002
Product Name: TECHNICAL NAPHTHALENEACETIC ACID	CAS [86-87-3]

Certify that:

- For each study cited in support of registration or reregistration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) that is an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter to cite that study.
- That for each study cited in support of registration or reregistration under FIFRA that is NOT an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter, or I have notified in writing the company(ies) that submitted data I have cited and have offered to: (a) Pay compensation for those data in accordance with sections 3(c)(1)(D) and 3(c)(2)(D) of FIFRA; and (b) Commence negotiation to determine which data are subject to the compensation requirement of FIFRA and the amount of compensation due, if any. The companies I have notified are: (check one)
☒ All companies on the data submitters' list for the active ingredient listed on this form (Cite-All Method or Cite-All Option under the Selective Method). (Also sign the General Offer to Pay below.)
☐ The companies who have submitted the studies listed on the back of this form or attached sheets, or indicated on the attached "Requirements Status and Registrants' Response Form."
- That I have previously complied with section 3(c)(1)(D) of FIFRA for the studies I have cited in support of registration or reregistration under FIFRA.

Signature	Date
<i>H. R. McLane</i>	OCT 14 1993
Name and Title (Please Type or Print) H. R. McLane, INC. By H. R. McLane Authorized Agent for/Jeanne K. Smith, Dir. Regulatory Affairs	

GENERAL OFFER TO PAY: I hereby offer and agree to pay compensation to other persons, with regard to the registration or reregistration of my products, to the extent required by FIFRA sections 3(c)(1)(D) and 3(c)(2)(D).

Signature	Date
<i>H. R. McLane</i>	OCT 14 1993
Name and Title (Please Type or Print) MCLANE, INC. By H. R. McLane Authorized Agent for/Jeanne K. Smith, Dir. Regulatory Affairs	

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR MANUFACTURING, REFORMULATING OR COMPOUNDING USE ONLY

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid - - - - - 95.0%

INERT INGREDIENTS: - - - - - 5.0%

Total 100.0%

EPA REG. NO. 5481-430

EPA Est. No. 5481-CA-1

**KEEP OUT OF REACH OF CHILDREN
DANGER**

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE.

WEAR SAFETY GOGGLES WHEN HANDLING.

Si usted no entiende la etiqueta, busque a alguien para que se lo explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

Danger: Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidance contact your regional office of the EPA.

IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following:

LIMITED WARRANTY:

AMVAC warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, warnings, cautions, and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, of residues on food crops, and upon reports of field experience. Testing has not been performed on all varieties of food crops, and plants, in all states, or under all application, weather and crop conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. AMVAC NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTY, EXPRESS OR IMPLIED. AMVAC EXPRESSLY EXCLUDES AND DISCLAIMS ALL IMPLIED WARRANTIES OF MERCHANTABILITY, FITNESS FOR PARTICULAR PURPOSE, OR ANY OTHER WARRANTY OF QUALITY OR PERFORMANCE.

LIMITED WARRANTY (Cont.)

THIS WARRANTY DOES NOT EXTEND TO, AND THE USER SHALL BE SOLELY RESPONSIBLE FOR, ANY LOSS OR DAMAGE WHICH RESULTS FROM THE USE OF THIS PRODUCT IN ANY MANNER WHICH IS INCONSISTENT WITH THIS LABEL'S DIRECTIONS, WARNINGS OR CAUTIONS.

USER'S EXCLUSIVE REMEDY AND AMVAC'S OR SELLERS' EXCLUSIVE LIABILITY FOR ANY CLAIM, LOSS, DAMAGE, OR INJURY RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY IN TORT, OR OTHERWISE SHALL BE LIMITED, AT AMVAC'S OPTION, TO REPLACEMENT OF, OR REPAYMENT OF THE PURCHASE PRICES FOR, THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. IN NO EVENT SHALL AMVAC OR SELLER BE LIABLE FOR SPECIAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for reformulating into products intended as plant growth regulators on ornamental plants and for the manufacture of NAA Sodium, Potassium or Ammonium Salts; NAA Ethyl Ester; or 1-Naphthaleneacetamide and only for those uses which are duly registered with the US EPA. Formulation into a plant growth regulator is prohibited for use on pineapples. Formulators using this product are responsible for obtaining EPA supplemental distributor registrations for their formulated products.

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner. (5481-430.PM4 / 10-15-93)

FOR THE FOLLOWING EMERGENCIES, PHONE 24 HOURS A DAY

1 - TRANSPORTATION: CHEMTREC 1-800-424-9300
2 - MEDICAL: HHS 1-800-228-5635 Ext. 169

Net Weight 50 Pounds

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD. - LOS ANGELES, CA 900238 U.S.A.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 31 1992

H. R. McLane, Authorized Agent for
AMVAC Chemical Corporation
H. R. McLane, Inc.
7210 Red Road
Suite 206
Miami, Florida 33143

Subject: Revised Labeling
EPA Registration No. 5481-430
Your Submission dated July 31, 1991

Dear Mr. McLane:

The labeling referred to above, submitted in connection with registration under the FIFRA, as amended, is acceptable. A stamped copy is enclosed for your records.

Sincerely Yours,

Cd Giles-Parker

Cynthia Giles-Parker
Product Manager (22)
Fungicide-Herbicide Branch
Registration Division(H7505C)

Enclosure

CONCURRENCES							
SYMBOL							
SURNAME	<i>CD Lewis</i>						
DATE	<i>8/13/91</i>						
EPA Form 1320-1 (12-70)							219
*U.S.GPO:1989-624-485/10186							OFFICIAL FILE COPY

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR FORMULATING USE ONLY

ACTIVE INGREDIENT:

1-Naphthaleneacetic acid - - - - - 95.0%

INERT INGREDIENTS: - - - - - 5.0%

Total 100.0%

EPA Est. No. 5481-CA-1

ACCEPTED

EPA REG. NO. 5481-430

Under the Federal Insecticide,
Fungicide and Rodenticide Act,
this product is for the pesticide
registered under
EPA Reg. No. 5481-430

KEEP OUT OF REACH OF CHILDREN

DANGER

CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE.
WEAR SAFETY GOGGLES WHEN HANDLING.

PRECAUCION AL USUARIO: si usted no lee ingles, no use este producto hasta que la etiqueta le haya sido explicado ampliamente

PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMAN AND DOMESTIC ANIMALS

Corrosive. Causes irreversible eye damage. Wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds or public waters unless in accordance with NPDES permit. For guidance contact your regional office of the EPA.

NOTICE: This product conforms to its chemical description and is reasonably fit for the purpose stated on the label, when used in accordance with directions under normal conditions of use. Manufacturer is not responsible for the use of this product contrary to the label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to the manufacturer and/or seller and the buyer assumes the risk of any such use. (05-01-91)

Net Contents 50 Pounds

INSTRUCTIONS FOR FORMULATION

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This pesticide may be used only for the formulation of plant growth regulator for use on apples, pears or olives. Formulation into a plant growth regulator is prohibited for use on pineapples. Formulators using this product are responsible for obtaining EPA supplemental distributor registrations for their formulated products.

STORAGE AND DISPOSAL

STORAGE: Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL: Do not contaminate water, food or feed by storage or disposal. Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

AMVAC CHEMICAL CORPORATION

4100 EAST WASHINGTON BLVD.

220



H. R. McLANE, INC.

7210 Red Road, Suite 206 - Miami, Florida 33143 - Phone & FAX - 305 661 1706
Chemical Consultants in EPA Regulatory Affairs
New FIFRA Registrations - Product Support - Registration Maintenance

July 31, 1991

Ms. Cynthia Giles-Parker PM-22
Document Processing Desk (AMEND)
Environmental Protection Agency (H7505C)
401 "M" Street S. W.
Washington D.C. 20460

Registrant: AMVAC CHEMICAL CORPORATION/EPA Est. No. 5481.

Subject: NAA Products Recently Received in Transferred

Submission of Labeling with AMVAC CHEMICAL CORPORATION name.

- ✓ 1. EPA Reg. No. 5481-430 Technical Naphthaleneacetic acid
- 2. EPA Reg. No. 5481-431 Technical 1-Naphthaleneacetamide
- 3. EPA Reg. No. 5481-432 Technical 1-Naphthaleneacetic acid Sodium Salt
- 4. EPA Reg. No. 5481-433 Technical 1-Naphthaleneacetic acid Ethyl Ester

Dear Ms. Giles-Parker

The above 4 products have been transferred to our firm from Rhone-Poulenc on May 20, 1991. We wish to submit labeling so that the files will reflect the AMVAC CORP. name and address on the labels. We therefore submit 5 copies of each. The the copy is exactly as the Rhone-Poulenc labeling with the obvious minor adjustments in the format.

Please stamp ACCEPTED on one copy of each product and return it for our permanent files and for future use with the Agency. If we decide to actually amend the copy in any one of these labels which requires submission to the Agency, we will follow with the proper amendment procedures with form #8570-1, etc.

If you have any questions in this important matter please call 305 661 1706 for a discussion.

Thank you for your cooperation in this matter.

Sincerely
H. R. McLANE, INC.

H. R. McLane, Authorized Agent for
Jack L. Prieur, Director, Regulatory Affairs
AMVAC CHEMICAL CORPORATION
HRM/nb/cc/JLP/ACC

FILE RM copy
7591-051



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MAY 30 1991

Glenn A. Wintemute
AMVAC CHEMICAL CORPORATION
4100 E. Washington Boulevard
Los Angeles, CA. 90023

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

Subject: Transfer of Pesticide Registrations From
Company Number 264 to 5481

Dear Mr. Wintemute:

Pursuant to your request in your letter and transfer agreement of April 9, 1991, we have approved the transfer of the following registrations from RHONE-POULENC AG COMPANY, company number 264, to AMVAC CHEMICAL CORPORATION, company number 5481.

The effective date of these changes is May 3, 1991.

<u>Registered Products</u>	<u>Old EPA Reg. No.</u>	<u>New EPA Reg. No.</u>
Amid Thin W Plant Regulator	264-137	5481-426
Fruitone N	264-141	5481-427
NAA-800 Plant Regulator	264-142	5481-428
TRE-HOLD Sprout Inhibitor All2	264-336	5481-429
Technical Naphthalene Acetic Acid	264-372	5481-430
Technical Naphthalene- acetamide	264-373	5481-431
Technical Naphthalene- acetamide acid Sodium Salt	264-374	5481-432
Technical Naphthalene- acetic acid Ethyl Ester	264-375	5481-433
TRE-HOLD Sprout Inhibitor for Citrus	264-397	5481-434



The effective date of issuance of the new EPA registration number is May 3, 1991. You should indicate the new company designation and new EPA Reg. No. on the labeling at the next printing. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, you must maintain complete and accurate records which identify by batch number, lot number or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Reg. No. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Reg. No. listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as they had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

In regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The maintenance fee is determined based solely on the total number of active sec. 3 and sec. 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be cancelled.

The data rights portion of this transfer will be handled under separate cover by Ms. Sherada Hobgood, also of the Administrative Processing Section. She can be reached at (703) 557-7248.

By copy of this letter we are informing RHONE-POULENC AG CO. of these changes.

Sincerely,



Donald R. Stubbs
Acting Section Head for
Administrative Processing Section
Registration Support Branch
Registration Division (H7505C)

cc: RHONE-POULENC AG CO.

DEC 15 1988

Ms. Linda B. Howard
Rhône-Poulenc Ag Company
2 T.W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

Dear Ms. Howard:

Subject: Crop Field Trial Residue Data
Technical Naphthaleneacetic Acid
EPA Registration No. 264-372
Technical 1-Naphthaleneacetamide
EPA Registration No. 264-373
Your Submission Dated November 19, 1988

This acknowledges receipt of the referenced submission. The data have been sent to the files and will be reviewed during the scheduled reevaluation of NAA. Please note this information for your records.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TB-767C)

52650:1:Miller,LT-8:RECD:12/12/88:1726/89:rw:VO:RJC

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

U. S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

RHONE-POULENC AG CO.
P.O. BOX 12014
T.W. ALEXANDER DRIVE
RESEARCH TRI. PARK, NC 27709

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 11/14/88. Our staff has completed a preliminary analysis of the material. The results are provided as follows.

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation.

If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



RHÔNE-POULENC AG COMPANY

408844-00

OCM

EPA Correspondence No. 88-350
November 10, 1988

Mr. Robert J. Taylor
U. S. Environmental Protection Agency
Registration Division (TS-767C)
Herbicide/Fungicide Branch
Office of Pesticide Programs
Crystal Mall Building No. 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Dear Mr. Taylor:

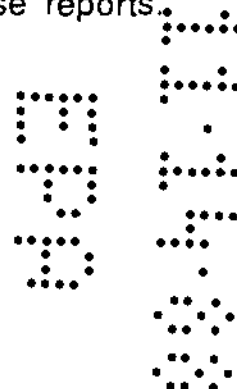
Re: AMID-THIN® W, EPA Reg. No. 264-137
NAA-800, EPA Reg. No. 264-142
TRE-HOLD® A112, EPA Reg. No. 264-336

As required by the data call-in enclosed are the reports of seven NAA multiple use trials on pears and apples conducted in 1987 in the major pear and apple growing regions of the country. The magnitude of residues found, method of residue analysis, supporting data and proposed tolerances are presented in this submission. Based on the new data, the currently established NAA tolerance of 1.0 ppm and the NAA amide tolerance of 0.10 ppm are adequate for multiple use applications.

Please contact if you have any questions regarding these reports.

Sincerely,

Linda B. Howard
Registration Specialist



TRANSMITTAL DOCUMENT

IN SUPPORT OF

AMID-THIN® W, EPA Reg. No. 264-137
Submission of Crop Field Trial Residue Data
Guideline 171-4 Magnitude of the Residue: Crop Field Trials

NAME AND ADDRESS OF SUBMITTER

Rhone-Poulenc Ag Company
P.O. BOX 12014, 2 T.W. Alexander Drive
Research Triangle Park, N.C. 27709

TRANSMITTAL DATE

October 28, 1988

Company Official: Warren A. Davis / RBH signature
Company Name: Rhone-Poulenc Ag Company
Company Contact: Warren A. Davis name
Phone: (919) 549-2379

Rhone-Poulenc Ag Company

TRANSMITTAL BIBLIOGRAPHY

- 40884401 1. Nygren, R. E. (1988). NAA - NAA Amide Apples Section D
Residues. Rhône-Poulenc Ag Company. Project No.: 860R10,
File No.: 40380.
- 40884402 2. Nygren, R. E. (1988). NAA - NAA Amide Pears Section D
Residues. Rhône-Poulenc Ag Company. Project No.: 860R10,
File No.: 40337.

9538



No reply necessary
J. Miller

9/23/88

RHÔNE-POULENC AG COMPANY

EPA Correspondence No. 88-248
July 5, 1988

Mr. Robert J. Taylor
U. S. Environmental Protection Agency
Registration Division (TS-767C)
Herbicide/Fungicide Branch
Office of Pesticide Programs
Crystal Mall Building No. 2
1921 Jefferson Davis Highway
Arlington, Virginia 22202

Dear Mr. Taylor:

Re: AMID-THIN W, EPA Reg. No. 264-137 ⁴²⁶
FRUITONE N, EPA Reg. No. 264-141 ⁴²⁷
NAA 800, EPA Reg. No. 264-142 ⁴²⁸
ROOTONE brand Rooting Hormone, EPA Reg. No. 264-29
TRE-HOLD Sprout Inhibitor A112, EPA Reg. No. 264-336 ⁴²⁹
TRE-HOLD Sprout Inhibitor for Citrus, EPA Reg. No. 264-397 ⁴³⁰
TRE-HOLD Tree Wound Dressing, EPA Reg. No. 264-248
TRE-HOLD Aerosol Manufacturing Concentrate, EPA Reg. No. 264-409
Technical Naphthaleneacetic Acid, EPA Reg. No. 264-372 ⁴³¹
Technical 1-Naphthaleneacetamide, EPA Reg. No. 264-373 ⁴³²
Technical 1-Naphthaleneacetic Acid, Sodium Salt, EPA Reg. No. 264-374 ⁴³³
Technical 1-Naphthaleneacetic Acid, Ethyl Ester, EPA Reg. No. 264-375 ⁴³⁴

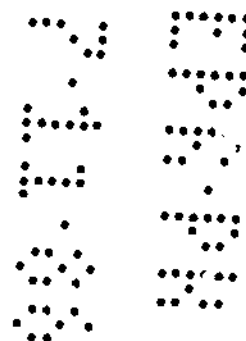
Our supplier of our NAA technical contained in the above referenced products has changed their company name from [REDACTED] to [REDACTED]

Please note this is a name change only and there are no modifications in the manufacture or specifications of the NAA containing products listed above.

If additional information is required, please contact me.

Sincerely,

Warren A. Davis
Registration Manager



Union Carbide Agricultural Products Co., Inc.
T.W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

Attention: Warren A. Davis

Gentlemen:

Subject: Registration Standard for Naphthaleneacetic Acid
Technical Naphthaleneacetic Acid
EPA Registration No. 264-372,
Rabbit Teratology and Range-finding Studies

The scientific review and evaluation of the above data have been completed. The following is a list of our comments and/or conclusions.

A. Range-finding Teratology Study (Rabbit) - Accession No. 252865

1. The major effect on reproduction was a dose-related increase in mean preimplantation loss at all doses in the treated animals. This effect may be an artifact of the small number of animals per group.
2. Teratogenic NOEL = 240 mg/kg/day HDT.
3. Fetotoxic NOEL = 240 mg/kg/day HDT.
4. Maternal Toxicity NOEL = 80 mg/kg/day.
5. Maternal LEL = 240 mg/kg/day, lethality.

B. Teratology Study in Rabbits - Accession No. 252866

1. The compound was not teratogenic at the dose tested.
2. Maternal toxicity was observed at the high dose in both studies.
3. Teratogenic NOEL = 150 mg/kg/day HDT.

89503; Miller: T-11; KRCG: 7/28/86; 8/7/86; NeeCee: IMF

CONCURRENCES

SYMBOL	TS-767C						
SURNAME	J. Miller						
DATE	7-31-86						

4. Fetotoxic NOEL = 150 mg/kg/day HDT.
5. Maternal Toxicity NOEL = 75 mg/kg/day.
6. Maternal LEL = 150 mg/kg/day, lethality.

The studies submitted satisfy the requirement for a teratology study in the rabbit. HAA is not a teratogen in this species.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 21 1986

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Review of a rabbit teratology study and range finding study submitted by Union Carbide for the NAA Registration Standard. EPA Identifying Number 264-372; EPA Record Number 175731; EPA Accession Numbers 252865 and 282866; Caswell #589; Shaughnessy No. 056002; Tox Branch Project Number 2072.

TO: Robert Taylor, PM #25
Fungicide/Herbicide Branch
Registration Division (TS-767C)

FROM: Stephen C. Dapson, Ph.D. *Stephen C. Dapson*
Pharmacologist, Review Section V
Toxicology Branch/HED (TS-769C) *7/17/86*

THRU: Laurence D. Chitlik, D.A.B.T.
Section Head, Review Section V
Toxicology Branch/HED (TS-769C) *LDC 7/17/86*
and
Theodore M. Farber, Ph.D., D.A.B.T.
Chief, Toxicology Branch
Hazard Evaluation Division (TS-769C) *TMF 7/22/86*

Registrant: Union Carbide Agricultural Products Company, Inc.
P.O. Box 12014
T.W. Alexander Drive
Research Triangle Park, N.C. 27709

Action Requested: Review range finding and primary rabbit teratology studies (369-111 and 369-105) submitted by Union Carbide for the Naphthaleneacetic Acid (NAA) Registration Standard.

Recommendations: These studies (369-111 and 369-105) have previously been reviewed in a Memorandum dated 6 July 1984 from Robert P. Zendzian to Robert Taylor (attached).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 6 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

SUBJECT: Naphthalene Acetic Acid, Teratology in the Rabbit

TO: Robert Taylor (PM-25)
Registration Division (TS-767)

FROM: Robert P. Lenzian Ph. D. *6/18/84*
Toxicology Branch
HED (TS-769)

THROUGH: William Butler, Head *William Butler 7-5-84*
Review Section III

William Burnam, Chief
Toxicology Branch *WLB 7/6/84*

Compound Naphthalene acetic acid

Registration #264-248, 336, 29, 142, 137 & 141

Accession #252865 & 66

Tox Chem #468 *589*

Registrant Union Carbide

Action Requested

The registrant has submitted for review reports of a range-finding and a full teratology study of NAA in the rabbit.

Conclusion

The studies submitted satisfy the requirement for a teratology study in the rabbit. NAA is not a teratogen in this species.

Discussion

The following reports were submitted by the Registrant and DERs on them are attached.

Citation

Range-finding Teratology Study in Rabbits. B.H. Cuddeback, J.L. Schardein & M. Blair, International Research and Development, 369-111, Oct 28, 1983 Accession No. 252865

Conclusion

The major effect on reproduction was a dose-related increase in mean preimplantation loss at all doses in the treated animals. This effect may be an artifact of the small number of animals per group.

Citation

Teratology Study in Rabbits, L.G. Miller, J.L. Schardein & M. Blair, International Research and Development Corp. 369-105, Nov 28, 1983 Accession No. 252866

Conclusion

The compound was not teratogenic at the doses tested.

The observation of preimplantation loss in the range-finding study appears problematical. Historical control data on 343 animals submitted with the range-finding study show a preimplantation loss of 30.8%. Historical control data on 75 animals submitted with the full teratology study show a preimplantation loss of 32.6 %. The range-finding study shows a preimplantation loss of controls 11.4%, 28mg/kg 23.2%, 80mg/kg 39.2% and 240mg/kg 42.1%. The full study shows preimplantation losses of controls 32.5%, 37.5mg/kg 36.7%, 75mg/kg 39.2% and 150mg/kg 41.8%.

The range-finding study had 3, 4, 4 and 3 gravid animals per respective treatment group and the full study had 15, 16, 14 and 15 gravid animals per respective treatment group. thus a very small difference in preimplantation loss in the range-finding control group produces a large percentage change.

Maternal toxicity was observed at the high dose in both studies.

NOELS

Range finding

Teratogenic 240mg/kg/day HDT
Fetotoxic 240mg/kg/day HDT
Maternal Toxicity 80mg/kg/day
Maternal LEL 240mg/kg/day,
lethality

Full study

Teratogenic 150mg/kg/day HDT
Fetotoxic 150mg/kg/day HDT
Maternal Toxicity 75mg/kg/day
Maternal LEL 150mg/kg/day,
lethality

Data Evaluation Report

Compound Naphthalene acetic acid

Citation

Range-finding Teratology Study in Rabbits. B.H. Cuddeback, J.L. Schardeun & M. Blair, International Research and Development, 369-111, Oct 28, 1983 Accession No. 252865

Reviewed by


Robert P. Zenzian PhD
Pharmacologist

6/18/84

Core classification Supplementary

Tox Catagory N/A

Conclusion

The major effect on reproduction was an increase in mean preimplantation loss, compared to controls, at all doses in the treated animals. This effect may be an artifact of the small number of animals per group.

Materials

Naphthalene acetic acid, 98.55%, Lot#RTS2846AC, Prod Code S80258

Sexually mature 4 1/2 to 5 month old female Dutch Belted rabbits, from Langshaw Farms

Methods

Animals were assigned, randomly, to four groups of five animals each and dosed orally at 0, 2B, 80 and 240mg/kg/day on days 6 through 27 of gestation.

Animals were superovulated three weeks prior to insemination with 50 USP units of chorionic gonadotropin IV. Semen was provided by five proven male of the same strain. Females were inseminated and immediately dosed IV with 100 USP units of chorionic gonadotropin. The day of insemination was designated day zero of gestation.

Animals were observed twice daily for mortality and once daily for toxic signs during the dosing period. Animals that died were necropsied. Body weights were taken on days 0, 6, 12, 18, 24 and 28. Surviving animals were sacrificed on day 28 and the uterus and ovaries examined for viable and nonviable fetuses, resorptions, number of implantations and number of corpora lutea.

Results

One animal dosed at 80mg/kg/day died on gestation day 17 with no clinical signs of toxicity. One animal dosed at 240mg/kg/day aborted on gestation day 28 following signs of toxicity consisting of hair loss, decreased feces and significant weight loss. No other animals showed compound-related signs of toxicity.

The major effect on reproduction was an increase in mean preimplantation loss at all doses in the treated animals. Controls 11.4%, Low dose 23.2%, intermediate dose 39.2% and high dose 42.1%. This is reflected in a decreased number of viable fetuses in the intermediate and high doses relative to control.

Discussion

The observation of preimplantation loss in this study appears problematical. Historical control data on 343 animals which was submitted with the report shows a preimplantation loss of 30.8 %.

The range-finding study had 3, 4, 4 and 3 gravid animals per respective treatment group, thus a very small difference in preimplantation loss in the control group can produce a large percentage change.

NOELS

Teratogenic 240mg/kg/day HDT
Fetotoxic 240mg/kg/day HDT
Maternal Toxicity 80mg/kg/day
Maternal LEL 240mg/kg/day, Lethality

Data Evaluation Report

Compound Naphthalene acetic acid

Citation

Teratology Study in Rabbits, L.G. Miller, J.L. Schardein & M. Blair, International Research and Development Corp. 369-105, Nov 28, 1983 Accession No. 252866

Reviewed by


Robert P. Zenzian PhD
Pharmacologist

6/12/84

Core classification Minimum

Tox Catagory N/A

Conclusion

The compound was not teratogenic at the doses tested.

Materials

Naphthalene acetic acid, 98.55%, Lot#RTS2846AC, Prod Code S80258

Sexually mature 4 1/2 to 5 month old female Dutch Belted rabbits, from Langshaw Farms

Methods

Animals were assigned, randomly, to four groups of 16 animals each and dosed orally at 0, 37.5, 75 and 150mg/kg/day on days 6 through 27 of gestation.

Animals were superovulated three weeks prior to insemination with 50 USP units of chorionic gonadotropin IV. Semen was provided by 8 proven male of the same strain. Females were inseminated and within one hour dosed IV with 100 USP units of chorionic gonadotropin. The day of insemination was designated day zero of gestation.

Animals were observed twice daily for mortality and gross signs of toxicity throughout the study once daily in detail for toxic signs on days 6 through 28 of gestation. Animals that died were necropsied. Body weights were taken on days 0, 6, 12, 18, 24 and 28. Surviving animals were sacrificed on day 28 and the uterus and ovaries examined for viable and nonviable fetuses, resorptions, number of implantations and number of corpora lutea.

All fetuses were weighed and examined for external abnormalities including the palate and ears. Fetuses were examined for organ malformations, including the brain and the eviscerated carcass processed for skeletal examination.

Statistical analysis was performed on appropriate numerical data.

Results

One low dose and three high dose animals died on study. All of these animals were gravid. Only two of the high dose animals showed signs of toxicity prior to death. No signs of compound related toxicity were observed in the surviving animals.

Weights of the pregnant animals varied over the gestation period with some indication of a dose related loss in the high dose. However the variation was such as to obscure possible compound effects in the low and intermediate doses.

No compound-related abnormalities in the pregnant animals were observed at necropsy.

No compound-related effect was observed on implantation or fetal viability.

No teratological effects were observed.

NOELs

Teratogenic 150mg/kg/day HDT
Fetotoxic 150mg/kg/day HDT
Maternal Toxicity 75mg/kg/day
Maternal LEL 150mg/kg/day, lethality



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709
(919) 549-2000

January 31, 1984

EPA Correspondence No. 37-84

Mr. Robert J. Taylor
Fungicide-Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Taylor:

Re: Registration Standard for NAA
(29-Month Progress Report)
TRE-HOLD® Tree Wound Dressing, EPA Reg. No. 264-248
TRE-HOLD® Sprout Inhibitor, EPA Reg. No. 264-336
ROOTONE® F, EPA Reg. No. 264-29
NAA-800, EPA Reg. No. 264-142
AMID-THIN® W, EPA Reg. No. 264-137
FRUITONE® N, EPA Reg. No. 264-141

Enclosed are two (2) copies of the following studies:

- | | |
|---|---------------------------------|
| 1. Naphthaleneacetic Acid Teratology Study in Rabbits | <u>Accession Nos.</u>
252866 |
| 2. Naphthaleneacetic Acid Range-Finding Teratology Study in Rabbits | 252865 |

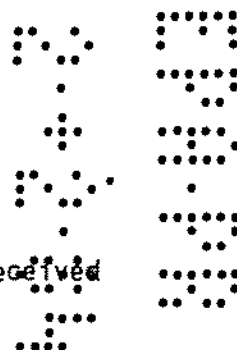
These data are developed solely by Union Carbide Agricultural Products Company, Inc. and not to be used to support a new registration, existing registration, or amended label for any other registrant without the express written consent of Union Carbide Agricultural Products Company, Inc. Please assign and communicate an accession number to these data to facilitate future reference.

We are also providing the status of pending work.

Toxicology

1. Skin Sensitization

The study is completed, but a final written report has not been received from the laboratory conducting this study.



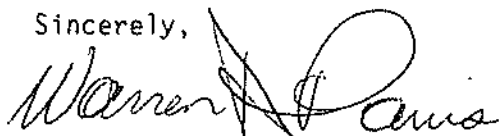
Mr. Robert Taylor
EPA Correspondence No. 37-84
January 31, 1984
Page 2

Residue

In the course of reviewing our obligations under the Registration Standard we discovered that our scheduled residue work in apples and pears was not completed during 1983. The program was developed, but an oversight by our field force resulted in failure to apply NAA for residue sampling in 1983. We now request a time extension for development of these data. The earliest date that treatments may now be applied is fall 1984. Data should be available by spring 1985. We trust this proposed schedule should be satisfactory.

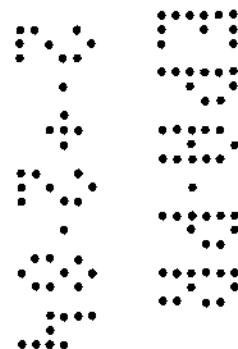
If you have any questions, please contact us promptly.

Sincerely,



Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db



JUN 25 1986

DuPont Carbide Agricultural Products Company, Inc.
T.W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

Attention: Warren A. Davis

Gentlemen:

Subject: Technical Naphthaleneacetic Acid
EPA Registration No. 264-372✓
Technical 1-Naphthaleneacetamide
EPA Registration No. 264-373
Technical 1-Naphthaleneacetic Acid
Sodium Salt
EPA Registration No. 264-374
Technical 1-Naphthaleneacetic Acid
Ethyl Ester
EPA Registration No. 264-375
Re: Revised Labeling Per NAA Registration Standard
and Agency Letter Dated February 22, 1985
Your Letter Dated April 10, 1985

The revised labeling is acceptable provided that the Storage and Disposal statements are placed under the "Directions for Use" heading. Submit five (5) copies of final printed labeling (for each product) incorporating this change. A stamped copy of each label is enclosed for your records.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosures
90275;Miller;T-10;KEMCO;6/23/86;6/30/86;dej;VO

CONCURRENCES

SYMBOL	TS-767C							
SURNAME	J. Miller							
DATE	6/25/86							

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR FORMULATING USE ONLY

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid 95.0%
INERT INGREDIENTS: 5.0%

EPA Reg. No. 264-372

EPA EST. No. 264-MO-01

KEEP OUT OF REACH OF CHILDREN

DANGER

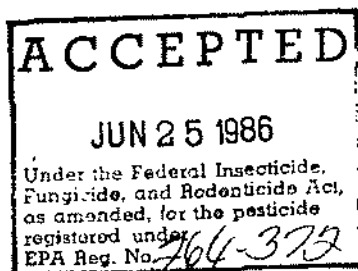
IN CASE OF EMERGENCY, TELEPHONE COLLECT (24 HOURS A DAY) IN U.S.A.
(304) 744-3487

©Union Carbide Agricultural Products Company, Inc.
Post Office Box 12014, T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

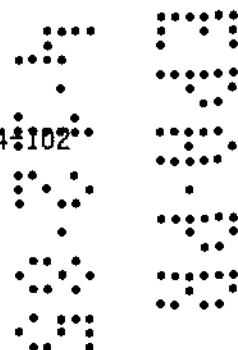
NET CONTENTS: 50 Lbs.

H60651

0288G/Pending/03-06-85



APC-7554-102



PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Corrosive, causes irreversible eye damage, wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 to 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds, or public waters unless in accordance with a NPDES permit. For guidance contact your regional office of the EPA.

STORAGE AND DISPOSAL

STORAGE

Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which you have handled or will handle other agricultural chemicals unless thoroughly cleaned.

PESTICIDE DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Pesticide wastes are acute hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into application equipment. Then dispose of liner in a sanitary landfill or, by incineration if allowed by state and local authorities. If drum is contaminated and cannot be reused, dispose of in the same manner.

INSTRUCTIONS FOR FORMULATION

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

This pesticide may be used only for the formulation of plant growth regulator for use on apples, pears or olives. Formulation into a plant growth regulator is prohibited for use on pineapples.

Formulators using this product are responsible for obtaining EPA registrations for their formulated products.



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

(919) 549-2000

March 7, 1985
EPA Correspondence No. 100-85

Mr. Robert J. Taylor
Registration Division (TS-767C)
Herbicide/Fungicide Branch
Office of Pesticide Programs
U.S. ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
Washington, D. C. 20406

Dear Mr. Taylor:

Re: Technical Naphthaleneacetic Acid
EPA Registration Number 264-372
Label Amendment

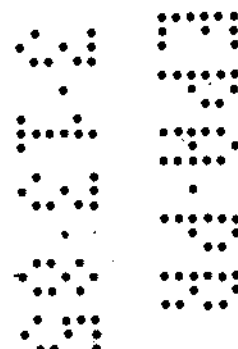
We are amending our Technical Naphthaleneacetic Acid label in accordance with EPA correspondence dated February 22, 1985. In addition, the Storage and Disposal statements have been updated to concur with PR Notice 83-3.

To complete this submission, we are enclosing an application for amended registration and five (5) proposed Technical Naphthaleneacetic Acid labels.

Sincerely,
Union Carbide Agricultural Products Company, Inc.

Karen S. Shearer
for Warren A. Davis, Registration Manager
Herbicides/Plant Growth Regulators
Registration & Regulatory Affairs

WAD/gb/4469
Enclosures



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U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDE PROGRAM (TD-727)
WASHINGTON, D.C. 20460

Form Approved OMB No. 2000-0012

APPLICATION FOR PESTICIDE:

☐ REGISTRATION
☒ AMENDMENT

Please read instructions
on reverse before com-
pleting.

SECTION I

1. COMPANY/PRODUCT NO. 264-372
2. DATE March 8, 1985
3. PRODUCT MANAGER Robert J. Taylor
4. PRODUCT CLASSIFICATION ☒ GENERAL ☐ RESTRICTED

5. NAME AND ADDRESS OF APPLICANT (Include ZIP Code)

Union Carbide Agricultural Products Company, Inc.
Post Office Box 12014
T. W. Alexander Drive
Research Triangle Park, North Carolina 27709

☐ CHECK IF THIS IS A NEW ADDRESS

6. PRODUCT NAME

Technical Naphthaleneacetic Acid

SECTION II

1. SUBJECT OF AMENDMENT

☐ RESUBMISSION IN RESPONSE TO AGENCY LETTER DATED _____

☐ FINAL PRINTED LABEL IN RESPONSE TO AGENCY LETTER DATED _____

☒ OTHER (Specify below)

Label amendment in response to Agency's letter dated February 22, 1985.

SECTION III

WILL THIS PRODUCT BE PACKAGED IN:

CHILD-RESISTANT PACKAGING ☐ YES ☒ NO

UNIT PACKAGING ☐ YES ☒ NO

If YES, unit pkg. wt. _____ No. per container _____

WATER-SOLUBLE PACKAGING ☐ YES ☒ NO

If YES, pkg. wt. _____ No. per container _____

2. TYPE OF CONTAINER

☐ METAL

☐ PLASTIC

☐ GLASS

☒ PAPER

☐ OTHER (Specify)

3. LOCATION OF NET CONTENTS

☐ LABEL ☒ CONTAINER

4. SIZE(S) OF RETAIL CONTAINER

50 lbs. fib. drum

5. LOCATION OF LABEL DIRECTIONS

☐ ON LABEL

☒ ON MATERIAL ACCOMPANYING PRODUCT

6. MANNER IN WHICH LABEL IS AFFIRED TO PRODUCT

☐ LITHOGRAPH

☐ OTHER (Specify)

☒ PAPER GLUED

☐ STENCILED

SECTION IV

1. CONTACT POINT (Complete items directly below for identification of individual to be contacted, if necessary, to process this application).

NAME

WARREN A. DAVIS

TITLE

Registration Manager/
Herbicides and Plant Growth Regulators

TELEPHONE NO. (Include Area Code)

(919) 549-2379

2. SIGNATURE

Warren A. Davis

3. TITLE

Reg. Mgr., H/PGR

4. TYPED NAME

Warren A. Davis

5. DATE SIGNED

March 8, 1985

6. DATE APPLICATION RECEIVED (Stamp)

246



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.

P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

(919) 549-2000

April 10, 1985
EPA Correspondence No. 172-85

Mr. Robert J. Taylor
U.S. ENVIRONMENTAL PROTECTION AGENCY
Registration Division (TS-767C)
Herbicide/Fungicide Branch
Office of Pesticide Programs
401 M Street, S. W.
Washington, D. C. 20460

Dear Mr. Taylor:

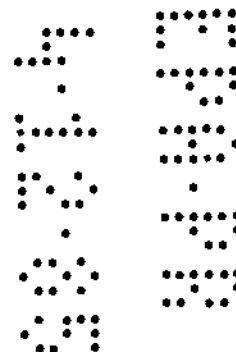
Re: NAA Technical Labels

Enclosed are revised labels for Technical Naphthaleneacetic Acid, Technical 1-Naphthaleneacetamide, Technical 1-Naphthaleneacetic Acid Sodium Salt, and Technical 1-Naphthaleneacetic Acid Ethyl Ester that contains a restriction against use on pineapples. This addition is being made as a result of your February 22, 1985, request (copy appended). These amended NAA technical labels should replace those filed on March 7, 1985, that did not contain the prohibition against use on pineapples.

Sincerely,
UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.

for Warren A. Davis
Warren A. Davis, Registration Manager
Herbicides/Plant Growth Regulators
Registration & Regulatory Affairs

WAD/gb/4696
Attachments





UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

(919) 549-2000

Accession No. 258237
Per RCB sent to the
File. J. Mille
6-20-8

EPA Correspondence No. 307-85

June 6, 1985

Mr. Robert J. Taylor
U. S. ENVIRONMENTAL PROTECTION AGENCY
Fungicide/Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
401 M Street, S.W.
Washington, DC 20460

Re: Naphthalene Acetic Acid Registration Standard

Dear Mr. Taylor:

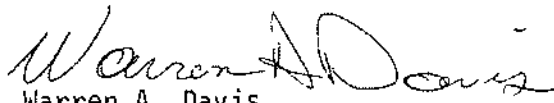
We are now able to submit additional residue data from the use of NAA containing products on apples and pears. A method of analysis is also appended for your reference. To aid the residue chemist in reviewing our submission we have included one copy of each product label used in treating apples and pears.

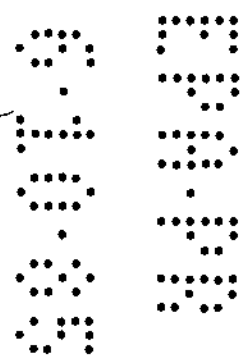
To ensure that adequate residue data will be available to support all use patterns of NAA on the referred crops we have initiated an additional substantial residue program during the 1985 season. The new data should be available for submission during the end of the first quarter of 1986.

We believe this should be acceptable since our 1984 program has confirmed that existing tolerance have not been exceeded.

Please note there are currently some significant data compensation questions regarding NAA containing products and these data are not to be used to support any applications or existing registrations for other NAA containing products without the expressed written consent of Union Carbide Agricultural Products Company, Inc.

Sincerely,


Warren A. Davis
Registration Manager
Herbicides/Plant Regulators



WAD:jb

cc: S. Harrison
S. Haberland
B. Casey
R. J. Otten
P. Rao

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(HED, PROVIDE)
CASWELL NO.:

REGISTRATION DIVISION DATA REVIEW RECORD
--TO BE USED FOR REVIEW OF STUDIES PPA ONLY--

Confidential Business Information--
Does Not Contain National Security Info. (E.O. 12065)

(HED PROVIDE)
PACK No.:

16437
6-17-86

CHEMICAL NAME:

NAA (salts, esters & acetamide)

(RD PROVIDE)
SHAUGHNESSY NO.

056001-056008

(HED/BUD/TSS COMPLETE)

Identifying Number	Action Code	Refer- ence Number	Record Number	Study Guideline or Narrative Description	Reg. Std. Review Submission Criteria (SEE BELOW)	Accession Number	Indicate with an (X) any of the listed submissions which are not studies as defined by the study guidelines
264-137	660	1	160,503	Residue Data	3	258237	
264-141	660	1	160,504	Method of			
264-336	660	1	160,505	Analysis			
264-142	660	1	160,507				

PRODUCT MANAGER (PM) or REVIEW MANAGER (RM) AND NUMBER:

Bob Taylor RM(25) 557-1800

PM/RM TEAM MEMBER AND NUMBER:

J. Miller 557-1800

DATE RECEIVED (EPA):

6-10-85

RD BRANCH CHIEF INITIALS:

6-10-85

APPLICABLE BOX:

- ☐ Adverse 6(a)(2) Data (405,406) ☐ Product Specific Data (Reregistration) (655,656)
☐ Suspect Data (415,416) ☒ Generic Data (Reregistration) (660,661)
☐ IBT Data (485,486) ☐ Special Review Data (870,871)

NUMBER OF INDIVIDUAL STUDIES SUBMITTED: 3

HAVE ANY OF THE ABOVE STUDIES (in whole or in part) BEEN PREVIOUSLY
SUBMITTED FOR REVIEW? (circle: yes or no) If yes, please identify the
study(ies):

TO BE COMPLETED BY RSEB

DATE SENT TO HED/BUD/TSS: 6-16-86

PRIORITY NUMBER: 30

PROJECTED RETURN DATE: 8-15-86

DATE RETURNED TO RD (HED/BUD/TSS PROVIDE):

RELATED ACTIONS:

INSTRUCTIONS: REVIEW RESIDUE DATA AND

METHOD OF ANALYSIS SUBMITTED IN

RESPONSE TO STANDARD. INDICATE STATUS OF DATA

GAP COMPLETION FOR NAA STANDARD.

HOW SENT TO:

HED: ☐ SIS ☐ TB ☒ RCB ☐ EAB ☐ EEB

RD: ☐ TSS

BUD: ☐ EAB ☐ SSB

TO:	TYPE OF REVIEW	NUMBER OF ACTIONS			FOR DATA SUBMITTED UNDER A REGISTRATION STANDARD: Review Submission Criteria
		Reregistration	Special Review	Other	
	Toxicology				Policy Note #31 1 = data which meet 6(a)(2) or meet 3(c)(2)(b) flagging criteria 2 = data of particular concern 3 = data necessary to determine tiered testing requirements
	Ecological Effects				
	<input checked="" type="checkbox"/> Residue Chemistry	4			NOTE TO TSS: Return 1 Copy To RSEB
	Exposure Assessment				
	Product Chemistry				
	Efficacy				
	Precautionary Labeling/Acute Tox.				
	Science Support				
	Economic Analysis				

INCLUDE AN ORIGINAL AND FOUR (4) COPIES OF THIS COMPLETED FORM FOR EACH BRANCH CHECKED FOR REVIEW.

~~It is:~~

Please return these data to the Product Manager.

REB has not reviewed these data at this time. These data were submitted in response to the registration standard.

We have scanned the submission. It consists of residue data and methodology.

The data do not appear to qualify under criteria 3 as being a tiered requirement. Please let us know if there is some other reason that these data fill criteria 3.

As indicated by Policy Note # 31, it appears that these data should be held by the product manager or PMSD until a comprehensive review is ~~scheduled~~ scheduled for Naphthalene acetic acid.

R. J. Quirk

REB, HED 6/19/86.

NAR. ID#s 264-137, 141, 336, 142

Record #s 160,502 - 507.

MAY 28 1986

Union Carbide Agricultural Products Company, Inc.
T.W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

Attention: Warren A. Davis

Gentlemen:

Subject: Technical Naphthaleneacetic Acid
EPA Registration No. 264-372 ✓
Re: NAA Registration Standard - Dermal Sensitization Study,
Accession No. 260086
Your Submission Dated April 22, 1985

The scientific review and evaluation of the above data have been completed. The following is a list of our comments and/or conclusions.

1. There was no irritation produced by the test material or vehicle control during the induction phase or at challenge dose. Thus, it is concluded that naphthaleneacetic acid is not a skin sensitizer.
2. Study Classification: Core Guideline Data.
3. Toxicity Category: Nonsensitizing.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

90266:Miller:T-7:KENCO:5/20/86:5/28/86:daj:JH

CONCURRENCES							
SYMBOL	TS-767C						
SURNAME	T. Miller						
DATE	5/28/86						



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM

APR 30 1986

SUBJECT: EPA File Symbol 264-Q
Naphthalene Acetic Acid

FROM: Deloris F. Graham *DJH 5/7/86 E 5/7/86*
Technical Support Section
Fungicide-Herbicide Branch
Registration Division (TS-767C)

TO: Robert Taylor, PM 25
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Applicant: Union Carbide
Agricultural Products Co., Inc.

Background:

Submitted Dermal Sensitization Study on Naphthalene Acetic Acid (NAA) in response to NAA Registration Standard. According to report of the analysis of the sample of test material, the sample is 98.5% active ingredient. *No* label or registration jacket submitted. Study conducted by Union Carbide's Bushy Run Research Center. Data under Accession Number 260086. Method of support not indicated.

Recommendation:

FHB/TSS finds these data acceptable to support conditional registration of product tested. Product tested should be clearly identified. Based on data submitted product tested is a nonsensitizer.

Review:

- (1) Dermal Sensitization Study: Bushy Run Research Center;
Report 47-80; July 11, 1984.

Procedure:

Three groups consisting of five male and five female guinea pigs each were treated with one of the following substances: test material (10% w/v suspension of NAA in 0.25% aqueous methyl cellulose), 0.25% aqueous methyl cellulose solution (vehicle control), or 0.5% w/v suspension of dinitrochlorobenzene in 0.25% of aqueous methyl cellulose (positive control). Each group received three 0.3 ml doses of the appropriate material, once a week for 3 weeks during induction phase. Two weeks after third induction phase a challenge dose was applied using the previously stated substances except a 0.1% w/v dinitrochlorobenzene was used. Observations made frequently during induction phase and at 24 and 48 hours after challenge dose.

Results:

No irritation reported produced by test material or vehicle control during induction phase or at challenge dose. Therefore, it is concluded that this product is not a skin sensitizer. Dinitrochlorobenzene, positive control, produced significant skin reaction increasing in severity with each progressing dose during induction phase and well-defined skin reaction at challenge dose using a no or very slightly irritating concentration, thereby indicating a sensitization response.

Study Classification: Core Guideline Data.

Toxicity Category: Nonsensitizing.



264-Q

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

(919) 549-2000

April 22, 1985
EPA Correspondence No. 232-85

U.S. ENVIRONMENTAL PROTECTION AGENCY
Registration Division
Herbicide/Fungicide Branch
Office of Pesticide Programs
401 M Street, S. W.
Washington, D. C. 20460

Attn: Robert J. Taylor

Re: Naphthaleneacetic Acid (NAA)

Dear Mr. Taylor:

Attached is the Dermal Sensitization Study requested in the Registration Standard for Naphthaleneacetic Acid. As a result, NAA is not a dermal sensitizer.

Sincerely,
UNION CARBIDE AGRICULTURAL PRODUCTS CO., INC.

Warren A. Davis, Registration Manager
Herbicides/Plant Growth Regulstors
Registration & Regulatory Affairs

WAD/gb
Attachment

Confidential Business Information—
Does Not Contain National Security Info. (E.O. 12065)

CHEMICAL NAME:

NAA

(RD PROVIDE)
SHAUGHNESSY NO.

056002

Identifying number	Action Code	Reference Number	Record Number	Study Guideline or Narrative Description	Reg. Std. Review Submission Criteria (SEE BELOW)	Accession Number	(RSERB Provide) MRID Number	(HED/BUD/TSS Complete) Review Results: Acceptable (A)/Unacceptable(U)
164-109 164-0	660	6	162,646	Dermal Sensitization Study	3	260086		

PRODUCT MANAGER (PM) OR REVIEW MANAGER (RM) AND NUMBER:

PM/RM TEAM MEMBER AND NUMBER:

Bob Taylor PM (25) 557-1800 Team 25 J. Miller 557-1800
DATE RECEIVED (EPA): 4-29-85 RD BRANCH CHIEF INITIALS: T.E.A.

CHECK APPLICABLE BOX:

- ☐ Adverse 6(a)(2) Data (405,406) ☐ Data Waiver Request (Reregistration) (650,651)
☐ Suspect Data (415,416) ☐ Formulation Data and Labeling (Reregistration) (655,656)
☐ IBT Data (485,486) ☒ Generic Data (Reregistration) (660,661)
☐ Groundwater Data (495,496) ☐ Special Review Data (870,871)

NUMBER OF INDIVIDUAL STUDIES SUBMITTED: 1

TO BE COMPLETED BY RSERB

RELATED ACTIONS:

DATE SENT TO HED/BUD/TSS:

INSTRUCTIONS:

Review dermal sensitization study on NAA, submitted in response to NAA Registration Standard.

PRIORITY NUMBER:

PROJECTED RETURN DATE:

DATE RETURNED TO RD (HED/BUD/TSS PROVIDE):

REVIEWS SENT TO:

HED: ☐ SIS ☐ TB ☐ RCB ☐ EAB ☐ EEBRD: ☒ TSSBUD: ☐ EAB ☐ SS8

TO: TYPE OF REVIEW	NUMBER OF ACTIONS			FOR DATA SUBMITTED UNDER A REGISTRATION STANDARD: Review Submission Criteria
	Reregistration	Special Review	Other	
TOX				Policy Note #31 1 = data which meet 6(a)(2) or meet 3(c)(2)(B) flagging criteria 2 = data of particular concern 3 = data necessary to determine tiered testing requirements
ECOL				
RESID				
EXP				
PROD				
EFF				
PRECAUTIONARY LABELING/ACUTE TOX.	1			NOTE TO TSS: Return 1 Copy To RSERB
SCIENCE SUPPORT				
ECONOMIC ANALYSIS				

INCLUDE AN ORIGINAL AND FOUR (4) COPIES OF THIS COMPLETED FORM FOR EACH BRANCH CHECKED FOR REVIEW.

Claimed confidential by submitter

REGISTRATION DIVISION DATA REVIEW RECORD
Confidential Business Information -- Does Not Contain National Security Information (E.O. 12065)

9303

10/15/84

1. CHEMICAL NAME

NAA ethyl ester

2. IDENTIFYING NUMBER

264-248
-336
-375

3. ACTION CODE

661

179
100
201

4. ACCESSION NUMBER

TO BE COMPLETED BY PM

5. RECORD NUMBER
130908 130909 130910

6. REFERENCE NUMBER

7. DATE RECEIVED (EPA)

6/26/84

8. STATUTORY DUE DATE

9. PRODUCT MANAGER (PM)

TAYLOR/T

10. PM TEAM NUMBER

25

14. CHECK IF APPLICABLE

☐ Public Health/Quarantine

☐ Minor Use

☐ Substitute Chemical

☐ Part of IPM

☐ Seasonal Concern

☐ Review Requires Less Than 4 Hours

TO BE COMPLETED BY PCB

11. DATE SENT TO HED/TSS

10/15/84

12. PRIORITY NUMBER

50

13. PROJECTED RETURN DATE

12/14/84

15. INSTRUCTIONS TO REVIEWER

- A. HED ☒ Total Assessment - 3(c)(5)
☐ Incremental Risk Assessment - 3(c)(7) and/or E.L. Johnson memo of May 12, 1977.
- B. SPRD (Send Copy of Form to SPRD PM)
☐ Chemical Undergoing Active RPAR Review
☐ Chemical Undergoing Active Registration Standards Review

- C. ☐ BFSO
D. ☐ TSS/RD
E. ☐ Other

F. INSTRUCTIONS

Review Union Carbide program
re res due program (10/15/84)
incl. request for time extension

16. RELATED ACTIONS

3(c)(1)(D)

- ☐ Use Any or All Available Information ☐ Use Only Attached Data
☐ Use Only the Attached Data for Formulation and Any or All
☐ Available Information on the Technical or Manufacturing Chemical.

18. REVIEWS SENT TO

- ☒ TR ☐ EEB ☐ EF ☐ PL
☒ RCS ☐ EFB ☐ CH ☐ BFSO

19. To	TYPE OF REVIEW	NUMBER OF ACTIONS							
		Registration	Petition	EUP	SLN	Sec. 18	Inert	MNR, USE	Other
HED	TOXICOLOGY								
	ECOLOGICAL EFFECTS								
	RESIDUE CHEMISTRY	3							
	ENVIRONMENTAL DATA								
RD/TSS	CHEMISTRY								
	EFFICACY								
	PRECAUTIONARY LABELING								
BFSO	ECONOMIC ANALYSIS								

20. ☐ Label Submitted with Application Attached

21. ☐ Confidential Statement of Formula

22. ☐ Representative Labels Showing Accepted Uses Attached

23. Data Returned to RD (to be completed by HED)

24. Include an Original and 4 (four) Copies of This Completed Form for Each Branch Checked for Review.

267



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 5 1984

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

MEMORANDUM:

SUBJECT EPA Nos. 264-248, 264-336, 264-375; Naphthaleneacetic Acid Registration Standard; Request of Union Carbide for extension of time to fill residue data gap for the ethyl ester of naphthaleneacetic acid.

FROM: J. Garbus, Chemist
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

THRU: Charles L. Trichilo, Ph.D., Chief
Residue Chemistry Branch
Hazard Evaluation Division (TS-769)

TO: R. Taylor / J. Felkel PM-25
Registration Division (TS-767)

Union Carbide Agricultural Products Co. has asked for an extension of time to develop and submit the additional residue data requested for the registration standard of naphthaleneacetic acid (NAA) and its salts, ester and amide. Union Carbide's letter of request specifically refers to the ethyl ester of NAA. The registration standard and associated data-gap call-in were issued on July 31, 1981. The Company notes that they do not market a NAA formulation for use on pineapples and will not develop data for this crop. While they need not develop this data, the data gap still exists and must be filled.

There are three registrations for the ethyl ester of NAA. EPA No. 264-248 refers to a 1% formulation in a pressurized container for use in ornamental horticulture. The ethyl ester of naphthaleneacetic acid is primarily marketed as Sprout Inhibitor All2 (EPA No. 264-336) used on apple, pear, and olive trees to control sprouts or suckers prior to bloom and fruit set. In 1982 a new source of the ethyl ester of NAA (tech.) was registered as EPA No. 264-375 (Reviewed by R. Loranger, 2/3/82).

Union Carbide markets formulations of NAA and its ethyl ester for use on apples, pears, and olives; it does not market a product for their use on pineapples.

Naphthaleneacetic acid, its salts, ester and amide act as plant growth regulators to prevent or retard sprouting, bud formation, and plant and leaf abscission. They are used to thin branches and fruit and to prevent fruit drop in the cultivation of pome fruits and olives and to induce fruit formation in pineapples so as to enhance flavor.

Tolerances are established for the acid on pome fruits (apples, pears and quinces) at 1.0 ppm; on olives at 0.1 ppm; and on pineapples at 0.05 ppm. (40 CFR 180.155) Tolerances of 1.0 ppm for apples and pears and 0.1 ppm on olives are established for the ethyl ester (40 CFR 180.155). The only registered use of the ester is for the control of sprouts and suckers during dormancy. A separate tolerance of 0.1 ppm on apples and pears exists for naphthaleneacetamide (40 CFR 180.309).

The metabolism of the free acid in plants is adequately understood for the purposes of the registration standard. Residues consist of the parent compound and its conjugates with glucose or aspartic acid. Adequate analytical methods are available for the determination of naphthaleneacetic acid, ester and amide on apples, pears, olives, and pineapples. The available residue data indicates that no detectable residues are found on apples, pears, and olives after application of naphthalene ethyl acetate. (PP 0F2277)

The residue chemistry data gaps identified in the registration standard are:

1. Dissociation or hydrolysis data for active compounds.
2. Data indicating whether or not the esters and amide of naphthaleneacetic acid are rapidly hydrolysed to the free acid in plants.
3. Data for residues on apples and pears reflecting the use of registered formulations of naphthaleneacetic acid.
4. Data for residues on pineapples and olives reflecting the use of registered formulations.

The residue chemistry section of the registration standard states that if it can be shown that the esters of naphthaleneacetic acid are rapidly hydrolysed to the free acid only minimal data for gaps 3 and 4 would be required.

RCB's original review of the tolerance petition for the ethyl ester of NAA (Sprout Inhibitor A112) concluded that the residue data for apples, pears, and olives were adequate and supported the requested tolerance, (A. Smith, 1/8/80, review of PP 0F2277).

In a further consideration of PP 0F2277, RCB addressed the point raised in residue data gap 2., namely, "... the need for showing that alpha-naphthaleneacetic acid (NAA) is primarily formed from the ethyl ester of NAA in plants...". RCB's memorandum states, " In view of the showing that the methyl ester is converted to the free acid," [see J. Ag. and Food Chem.: 10, 199 (1962)] "it is reasonable to conclude that the closely related ethyl ester is also converted in plants to the acid NAA." (Memorandum, A. Smith, 4/16/80 in PP 0F2277) As we have accepted the residue data for the ethyl ester as adequate and as it is likely that the ester is hydrolysed to and metabolized as the free acid, we conclude that the postulated data gaps are met for the ethyl ester of naphthaleneacetic acid used as a sprout inhibitor during dormancy on apples, pears, and olives.

In a telephone conversation with Mr. Warren Davis of Union Carbide we were informed that the residue data trial for which Union Carbide requests an extension involves the sequential application of the ester and free acid of NAA to apple and pear trees. The ethyl ester is to be applied for the purpose for which it is registered, that is to inhibit sprouting in the prebloom stage, followed by a later application of the K salt of NAA to thin or set the fruit.

Although residue data have been submitted for separate use of the free acid and of the ester of NAA, there are no data available as to residue levels when they are used sequentially. This does constitute a real data gap that needs to be filled. We therefore recommend that the requested extension of the time needed to obtain and submit ~~these~~ data be granted.

Conclusions and Recommendations:

1. We conclude the residue data for use of the ethyl ester of naphthaleneacetic acid on apples, pears, and olives are adequate for the purposes of the registration standard.

2. As Union Carbide does not market a naphthaleneacetic acid formulation for use on pineapples, it need not submit residue data for this crop. This is however, still a data gap that needs to be filled.

3. We conclude that residue data do not exist for apples and pears for the practice of applying the ethyl ester of naphthaleneacetic acid followed later in the growing season by the application of the free acid.

4. We recommend that the requested extension of time be granted to Union Carbide to obtain and submit ~~this~~ data.

cc: Naphthaleneacetic Acid S.F., R.F., Circ., Beusch, Garbus
RDI:A.A.Rathman:10/31/84:R. D. Schmitt:10/31/84
RCB:CM#2:RM810:X7484:J. Garbus:edited:wh:11/2/84



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P.O. BOX 1100, NEW YORK, N.Y. 10108
NEW YORK, N.Y. 10108

(212) 542-2100

EPA Correspondence No. 228-84

June 15, 1984

Mr. Robert J. Taylor
Fungicide - Herbicide Branch
Registration Division (TS 767-C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, SW
Washington, DC 20406

RE: Progress report for Naphthaleneacetic acid registration standard

Dear Mr. Taylor:

The registration standard has identified that additional residue data is required for apples, pears, olives and pineapples that have been treated with the ethyl ester of Naphthaleneacetic acid. We have recently identified an oversight that resulted in delays in developing the residue data. We request a time extension so the desired residue trials may be established this year with analysis scheduled for the first quarter of 1985.

A residue program has now been established that will produce apple samples from New York, Washington and North Carolina and pear samples from Washington and New York.

No work is planned for olives since the use patterns for sprout inhibition employs low rates, well removed from harvest. Union Carbide does not market an NAA formulation for use on pineapples, therefore, no data will be developed for this crop.

Thank you,

Warren A. Davis

Warren A. Davis
Herbicides/Plant Growth Regulators
Registration and Regulatory Affairs

WAO/ja

CC: D. Page S. Harrison
 S. Haberland J. McKinley
 R. Hanson K. Bridge
 K. Dunster D. Fritz

* Pages 263-283 Claimed confidential by submitter*

MAR 28 1983

Warren A. Davis
Union Carbide Agricultural
Products Company, Inc.
T.W. Alexander Drive
P.O. Box 12014
Research Triangle Park, NC 27709

Dear Mr. Davis:

Subject: Registration Standard for NAA - 18-Month Progress Report
Technical Naphthaleneacetic Acid
EPA Registration Number 264-372
Your Letter of March 8, 1983

This acknowledges receipt of your 18-Month Progress Report for the NAA
registration. The information submitted has been noted and made a part of
the file.

Sincerely yours,

Robert J. Taylor
Product Manager (25) *JRT*
Fungicide-Herbicide Branch
Registration Division (TS-767C)

TS-767:R.TAYLOR:DCR-25398:WANG-3336C:vgr:Raven:479-2013:3/25/83

CONCURRENCES

SYMBOL							
SURNAME							
DATE							



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

(919) 549-2000

March 8, 1983

EPA Correspondence No. 66-83

*file in the jacket
for the Technical NAA
264-372.*

Mr. Robert J. Taylor
Fungicide-Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Taylor:

Re: Registration Standard for NAA
18-Month Progress Report
TRE-HOLD® Aerosol, EPA Reg. No. 264-248
TRE-HOLD® Sprout Inhibitor A-112, EPA Reg. No. 264-336 -
RDOTONE® F, EPA Reg. No. 264-29
NAA® - 800, EPA Reg. No. 264-142 ✓
AMID-THIN® W, EPA Reg. No. 264-137
FRUITONE® N, EPA Reg. No. 264-141 ✓

We are providing the status and target dates for completion of pending studies. No new data is being submitted at this time.

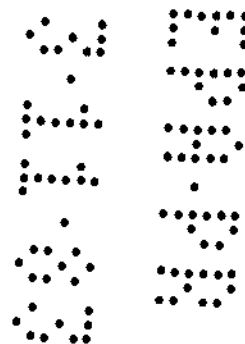
Toxicology

1. Rabbit Teratology

Work is in progress, and completion of the study is expected by late third quarter of 1983.

2. Skin Sensitization

Since the protocol for this study did not meet EPA guideline requirements, another study has been authorized and should be initiated within several weeks. We anticipate completion by third quarter of 1983.



285

Mr. Robert J. Taylor
EPA Correspondence No. 66-83
March 4, 1983
Page 2

Hydrolysis

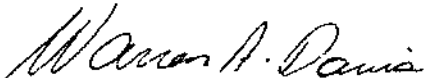
The completion of the hydrolysis study was delayed, and will be completed within the next two to three weeks. The study should be available for your review with our next progress report.

Residue

Residue samples have been collected and received for analysis. Analysis of samples will be finished by third quarter of 1983.

If you have any questions, contact us promptly.

Sincerely,



Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db

286

**UNION
CARBIDE**

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR FORMULATING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid Minimum 95.0%

INERT INGREDIENTS: Minimum 5.0%

EPA Reg. No. 264-372

EPA EST. No. 264-MO-01

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

Danger, corrosive, causes irreversible eye damage, wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds, or public waters unless in accordance with a NPDES permit. For guidance contact your regional office of the EPA.

STORAGE AND DISPOSAL

Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which have handled or will handle other agricultural chemicals unless thoroughly cleaned.

Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, state, or local procedures.

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum cannot be reused, dispose of in the same manner.

INSTRUCTIONS FOR FORMULATION

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

This pesticide may be used only for the formulation of a plant growth regulator. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

**IN CASE OF EMERGENCY, TELEPHONE COLLECT
(24 HOURS A DAY) IN U.S.A. (304) 744-3487**

DISTRIBUTED BY:

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.

P.O. Box 12014, T.W. Alexander Drive, Research Triangle Park, NC 27709

NET CONTENTS: 50 lbs.

H60651

287

APC-7554-102

**UNION
CARBIDE**

Technical Naphthaleneacetic Acid

A PLANT GROWTH REGULATOR FOR FORMULATING USE ONLY.

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1-Naphthaleneacetic Acid Minimum 95.0%

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©UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.
P.O. Box 12014, T.W. Alexander Drive, Research Triangle Park, NC 27709

NET CONTENTS: 50 lbs.

H60651

NOT REVIEWED

In accordance with PR Notice 88-8.

[Based on Draft Labeling dated 11/15/82]

288

APC-7554-102

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Technical Naphthaleneacetic Acid

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EPA Reg. No. 264-372

EPA EST. No. 264-MO-01

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**IN CASE OF EMERGENCY, TELEPHONE COLLECT
(24 HOURS A DAY) IN U.S.A. (304) 744-3487**

DISTRIBUTED BY:

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.
P.O. Box 12014, T.W. Alexander Drive, Research Triangle Park, NC 27709

NET CONTENTS: 50 lbs.

H60651

289

APC-7554-102

**UNION
CARBIDE**

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EPA EST. No. 264-MO-01

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Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which have handled or will handle other agricultural chemicals unless thoroughly cleaned.

Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, state, or local procedures.

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum cannot be reused, dispose of in the same manner.

INSTRUCTIONS FOR FORMULATION

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

This pesticide may be used only for the formulation of a plant growth regulator. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

**IN CASE OF EMERGENCY, TELEPHONE COLLECT
(24 HOURS A DAY) IN U.S.A. (304) 744-3487**

DISTRIBUTED BY:

©UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.
P.O. Box 12014, T.W. Alexander Drive, Research Triangle Park, NC 27709

NET CONTENTS: 50 lbs.

H60651

290

APC-7554-102

**UNION
CARBIDE**

Technical Naphthaleneacetic Acid

Manufacturing Date: AUG 17, 1982

A PLANT GROWTH REGULATOR FOR FORMULATING USE ONLY.

ACTIVE INGREDIENT:

1-Naphthaleneacetic Acid Minimum 95.0%

INERT INGREDIENTS: Minimum 5.0%

EPA Reg. No. 264-372

EPA EST. No. 264-MO-01

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

Danger, corrosive, causes irreversible eye damage, wear safety goggles when handling. Harmful if swallowed. Avoid contact with skin and eyes.

STATEMENT OF PRACTICAL TREATMENT

In case of eye contact flood eyes immediately with plenty of water for at least 15 minutes and get medical attention. If swallowed, call a doctor or poison control center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. In case of skin contact, flush with plenty of soap and water.

ENVIRONMENTAL HAZARDS

Do not discharge into lakes, streams, ponds, or public waters unless in accordance with a NPOES permit. For guidance contact your regional office of the EPA.

STORAGE AND DISPOSAL

Avoid contact with other pesticides, seeds, fertilizers or feed stuffs. Do not use in equipment or in containers in which have handled or will handle other agricultural chemicals unless thoroughly cleaned.

Pesticide, spray mixture, or rinse water that cannot be used according to label instructions must be disposed of according to applicable Federal, state, or local procedures.

Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. If drum cannot be reused, dispose of in the same manner.

INSTRUCTIONS FOR FORMULATION

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

This pesticide may be used only for the formulation of a plant growth regulator. Formulators using this product are responsible for obtaining EPA registrations for their formulated products.

**IN CASE OF EMERGENCY, TELEPHONE COLLECT.
(24 HOURS A DAY) IN U.S.A. (304) 744-3487**

DISTRIBUTED BY:

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.

P.O. Box 12014, T.W. Alexander Drive, Research Triangle Park, NC 27709.

NET CONTENTS: 50 lbs.

H60651

291

APC-7554-102



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.

P. O. BOX 12014, T. W. ALEXANDER DRIVE

RESEARCH TRIANGLE PARK, N. C. 27709

December 17, 1982

EPA Correspondence No. 305-82

Mr. Robert J. Taylor
Fungicide-Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Taylor:

Re: Reregistration under NAA Registration Standard for:
Technical Naphthaleneacetic Acid, EPA Reg. No. 264-372
Technical 1-Naphthaleneacetamide, EPA Reg. No. 264-373
Technical 1-Naphthaleneacetic Acid, Sodium Salt, EPA Reg. No. 264-374
Technical 1-Naphthaleneacetic Acid, Ethyl Ester, EPA Reg. No. 264-375

As requested in your correspondence dated December 16, 1982, we are enclosing a FIFRA 3(c)(2)(B) summary sheet for each product captioned above.

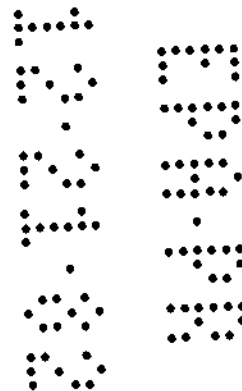
If you have any questions, contact us as soon as possible.

Sincerely,

Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db

Enclosure



FIFRA § 3(C) (2) (B) SUMMARY SHEET

EPA Registration No.: 264-372
 Product Name: Technical Naphthaleneacetic Acid
 Applicant's Name: Union Carbide Agricultural Products Company, Inc.
 Registration Standard for Products Containing: NAA
 Date Registration Standard Issued: June 30, 1981
 Date Guidance Package Issued: August 18, 1981

With respect to the requirement to submit "generic" data imposed by the FIFRA section 3(c) (2) (B) notice contained in the referenced Guidance Package, I am responding in the following manner:

1. ☐ Attached is a completed "Generic Data Exemption Statement."
2. ☒ I will submit data in a timely manner to satisfy the following requirements. If the test procedures I will use deviate from (or are not specified in) the Registration Guidelines or the Protocols contained in the Reports of Expert Groups to the Chemicals Group, OECD Chemicals Testing Programme, I enclose the protocols that I will use:
3. ☐ I have entered into an agreement with one or more other registrants under FIFRA § 3(C) (2) (B) (ii) to satisfy the following data requirements. The tests, and any required protocols, will be submitted to EPA by (name of other registrant).
4. ☐ I enclose a completed "Statement of Willingness to Enter Into An Agreement With Other Registrants For Development Of Data" with respect to the following data requirements:
5. ☐ I request that you amend my registration by deleting the following uses:
6. ☐ I request voluntary cancellation of the registration of this product.

Dated: December 17, 1982

Registrant's Authorized
Representative:


(signature)

Warren A. Davis
(typed)

DEC 13 1982

Union Carbide Agricultural Products
Company, Inc.
P.O. Box 12014
T. W. Alexander Drive
Research Triangle Park, NC 27709

Attention: Warren A. Davis

Gentlemen:

Subject: Technical Naphthaleneacetic Acid
EPA Registration No. 264-372
Technical 1-Naphthaleneacetamide
EPA Registration No. 264-373
Technical 1-Naphthaleneacetic Acid, Sodium Salt
EPA Registration No. 264-374
Technical 1-Naphthaleneacetic Acid, Ethyl Ester
EPA Registration No. 264-374

We acknowledge receipt of your submission of November 29, 1982, forwarding information requested in the NAA standard. The information submitted is acceptable and has been made a part of the file. Please complete and return the enclosed FIFRA 3(a)(2)(B) summary sheet for the subject products.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

TS-767C:Taylor:DCR-07506:WANG-1562C:hk:Raven:479-2013:12/9/82

Appendix II-1

DATA COMPENSATION STATEMENT: REREGISTRATION

EPA Reg. No.: 264-372
Product Name: Technical Naphthaleneacetic Acid
Applicant's Name & Address: Union Carbide Agricultural Products Company, Inc.
P. O. Box 12014, T. W. Alexander Drive
Research Triangle Park, NC 27709
Date of application for reregistration: November 29, 1982
Registration Standard for products containing: 1-Naphthaleneacetic Acid
Date Reregistration Standard Issued: June 30, 1981
Date Reregistration Guidance Package Issued: August 18, 1981

In connection with applicant's application for reregistration under the Registration Standard and Guidance Package identified above:

(A) Applicant offers to pay compensation to other persons to the extent required by sections 3(c) (1) (D) and 3(c) (2) (D) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended.

(B) Applicant understands and acknowledges that if EPA approves the application, the approval will be based solely on EPA's consideration of:

(1) All the generic data which, according to the Registration Standard and Guidance Package identified above, were found relevant to EPA's evaluation of the registrability of applicant's product (taking into account the product's composition and formulation category, and the uses its label will permit); and

(2) The product-specific data listed on the form entitled "Product-Specific Data Report" which is part of this application.

(3) Applicant states that offers to pay compensation have been furnished to the persons and in the form specified by the Guidance Package identified above.

Dated: November 29, 1982

Name of registrant's

authorized representative: Warren A. Davis
(signature)

Warren A. Davis

(typed)

*No offers to pay were actually sent since Union Carbide Agricultural Products Co., Inc. is the only company listed as having submitted compensable data in the EPA Registration Standard for Naphthaleneacetic acid and its derivatives.

PRODUCT SPECIFIC DATA REPORT

Appendix II-2

EPA Registration No. 264-372

Technical Naphthaleneacetic Acid

Reg. Std. for
Data Req. Std. Issued: 6/30/81
Guidance Package Date: 8/18/81

Registration/ Guideline No.	Name of Test	Test not required for by (Product listed above (check below)	Is he complying with Data Requirements		For EPA Use Only! Accession Numbers Assigned
			Filing No. ID #	Submitting Data (attached) (check below)	
162.51-1	Product identity and disclosure ingredients			X	
-1	Description of manufacturing process			X	
-2	Discussion on formation of unintentional ingredient			X	
-3	Declaration and certification of ingredient limits			X	
-4	Product analytical methods and data			X	
162.52-2(1)	Color			X	
-2(2)	Odor			--	
-2(3)	Melting Point			X	
-2(4)	Solubility			X	
-2(5)	Stability			--	
-2(6)	Octanol/water partition coefficient			--	
-2(7)	Physical State			X	
-2(8)	Density or specific gravity			--	
-2(9)	Boiling Point			--	
-2(10)	Vapor pressure			--	
-2(11)	pH			--	
-2(12)	Storage stability			--	
-2(13)	Flammability			--	
-2(14)	Oxidizing or reducing action			--	
-2(15)	Explosiveness			--	
-2(16)	Miscibility			--	
-2(17)	Viscosity			--	
-2(18)	Corrosion characteristics			--	
-2(19)	Dielectric breakdown voltage			--	
162.71-4(1)(i)	Safe to use field test	X			
-4(2)	Full-scale field test	X			
162.72-1	First acute LD ₅₀ —rainbow trout and bluegill			X	
-1	Acute toxicity to aquatic invertebrates			X	
-2	Acute toxicity to estuarine and marine organisms	X			
-4(1)(i)	Short term simulated field test	X			
-4(1)(ii)	Long term simulated field test	X			
162.61-1	Acute oral toxicity			X	
-1	Acute dermal toxicity			X	
-2	Acute inhalation toxicity			X	
-3	Primary eye irritation			X	
-4	Primary dermal irritation			X	
-5	Dermal sensitization			X	

Form Approved
OMB No. 158-R0066

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDE PROGRAMS (71-567) WASHINGTON, D.C. 20460 APPLICATION FOR AMENDED PESTICIDE PRODUCT REGISTRATION (Read instructions on last page before completing) B		1. REFERENCE CODE 3. REGISTRATION NO. 264-372	EPA USE ONLY 4. PRODUCT MANAGER R. Taylor
5. NAME AND ADDRESS OF REGISTRANT (Include Zip Code) Union Carbide Agricultural Products Co., Inc. P. O. Box 12014, T. W. Alexander Drive Research Triangle Park, NC 27709 <input type="checkbox"/> CHECK HERE IF THIS IS A NEW ADDRESS		6. TYPE OF AMENDMENT <input type="checkbox"/> CHANGE IN PRODUCT NAME <input type="checkbox"/> MINOR CHANGE IN FORMULATION <input type="checkbox"/> REQUEST FOR ADDITIONAL BRAND NAMES <input type="checkbox"/> REQUEST FOR MULTIPLE INERT FORMULATION PER PR NOTICE 74-2 <input type="checkbox"/> DELETION OF LABEL TEXT <input type="checkbox"/> ADDED USES (without data) <input type="checkbox"/> ADDED USES (with data) <input type="checkbox"/> GENERAL REVISION OF LABEL	
7. PRODUCT NAME Technical Naphthaleneacetic acid		8. EXPERIMENTAL PERMIT NO.	
9. SUBJECT OF AMENDMENT (See Instructions) Reregistration under registration standard			
12. TYPES OF DATA SUBMITTED		FOR EPA USE ONLY	
<input type="checkbox"/>	01 NONE	1201	
<input checked="" type="checkbox"/>	02 PRODUCT CHEMISTRY	1202	
<input type="checkbox"/>	03 RESIDUE CHEMISTRY	1203	
<input type="checkbox"/>	04 ENVIRONMENTAL CHEMISTRY	1204	
<input type="checkbox"/>	05 EFFICACY	1205	
<input type="checkbox"/>	06 PHYTOXICITY	1206	
<input checked="" type="checkbox"/>	07 HUMAN SAFETY	1207	
<input type="checkbox"/>	08 DOMESTIC ANIMAL SAFETY	1208	
<input checked="" type="checkbox"/>	09 FISH AND WILDLIFE SAFETY	1209	
<input type="checkbox"/>	10 BENEFICIAL INSECT SAFETY	1210	
<input type="checkbox"/>	11 ACCIDENT EXPOSURE EXPERIENCE	1211	
<input type="checkbox"/>	12 OTHER (Specify)	1212	
<input type="checkbox"/>	13 OTHER (Specify)	1213	
13. METHOD OF SUPPORT (See Instructions) <input type="checkbox"/> Required Supporting Data Attached. (2A) <input type="checkbox"/> Required Supporting Data is Submitted by Reference. (2B) <input type="checkbox"/> Proceed on the Basis of Established Use Patterns. (2C)		14. CONTACT POINT Complete items directly below for identification of individual to be contacted, if necessary, to process this application.	
OFFER TO PAY STATEMENT I hereby offer to pay reasonable compensation to the extent provided under Section 3 (c)(1)(D) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, and in accordance with the Regulations and Guidelines published thereunder for use of any test data which has been submitted to the U.S. Environmental Protection Agency in connection with an application for the registration of a pesticide for the first time on or after October 21, 1972 and which may be used in support of the registration application for the subject pesticide.		NAME Warren A. Davis TITLE Registration Manager Herbicides/Growth Regulators TELEPHONE NO. (Include Area Code) (919) 549-2379	
16. SIGNATURE Warren A. Davis		17. TITLE Registration Manager	
18. TYPED NAME Warren A. Davis		19. DATE SIGNED 11/29/82	
		15. DATE APPLICATION RECEIVED (Stamped) 297	

DEC 6 1982

Union Carbide Agricultural Products
Company, Inc.
T.W. Alexander Drive
P. O. Box 12614
Research Triangle Park, NC 27709

Attention: Warren A. Davis

Gentlemen:


Subject: Technical Naphthaleneacetic Acid
EPA Registration No. 264-372
Your Submission of November 16, 1982
EPA Correspondence No. 249-82
Registration Standard for NAA 15-Month
Progress Report

This acknowledges receipt of your submission of November 16, 1982, forwarding a 15-month progress report for the NAA reregistration requirements. The information submitted has been noted and made a part of the file.

The information submitted, Data Accession Number 248926, supports your request for a waiver from the data requirement for an acute inhalation study. We no longer request that you supply us with this study on your technical naphthaleneacetic acid.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)



TS-767C:RJ TAYLOR:DCR-04035:WANG-1461C:lwy:Raven:479-2013:12/2/82



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

November 30, 1982

CERTIFIED MAIL NO. P 353 488 238
RETURN RECEIPT REQUESTED

Mr. Clinton C. Shipman, President
Greenwood Chemical Company
P. O. Box 26
Greenwood, VA 22943

Dear Mr. Shipman:

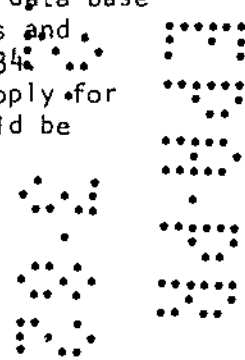
We have received your letter dated October 7, 1982 inquiring whether Union Carbide Agricultural Products Company, Inc. (APC) would be interested in jointly developing and sharing the cost with Greenwood Chemical Company (Greenwood) of defensive data for Naphthaleneacetic acid and its amide and sodium salt, in conformance with EPA's requirements for data as listed in their Registration Standard for these materials.

APC is interested in sharing the cost of developing the data with Greenwood. We must point out two factors, however.

First, APC has developed and collected, or is in the process of developing, all the data called for by EPA. Therefore, the only action required of Greenwood is to reach agreement with APC on the basis for sharing in the cost of data.

Second, in our opinion, your letter of October 7, 1982 does not constitute an offer to pay compensation to the extent required by FIFRA Section 3(c)(1)(D) and 3(c)(2)(D). We would require a properly worded offer to pay before beginning negotiations regarding the amount and terms of compensation. As you know, you must make an offer to pay to APC before you can correctly certify to EPA that you have made the offer to pay in order to avoid suspension of your technical registrations for NAA.

Since Greenwood and APC are the only two remaining registrants of technical NAA materials, it is logical and proper that the cost be divided equally. For your information, our estimated replacement cost for the present data base developed by Union Carbide on which the registration standard depends and the added cost for new defensive data requested by EPA totals \$619,634. Thus, should you elect to maintain your existing registrations, or apply for new registrations supported by this data, Greenwood's fair share would be half, or \$309,817.



299

Mr. Clinton C. Shipman, President
November 30, 1982
Page 2

We are sending a copy of this letter to the Registration Division of EPA/OPP to make sure their file is complete on this subject.

Your prompt response will be appreciated.

Sincerely,

Warren A. Davis

Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db

cc: ✓ Mr. Robert Taylor
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

5 9
4 3
8 2
8 2

November 16, 1982

EPA Correspondence No. 249-82

Mr. Robert Taylor
Fungicide-Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

264-372
Accession II
248926

Dear Mr. Taylor:

Re: Registration Standard for NAA
(15-Month Progress Report)
TRE-HOLD® Aerosol, EPA Reg. No. 264-248
TRE-HOLD® Sprout Inhibitor A-112, EPA Reg. No. 264-336
ROOTONE® F, EPA Reg. No. 264-29
NAA-800, EPA Reg. No. 264-142
AMIO-THIN® W, EPA Reg. No. 264-137
FRUITONE N, EPA Reg. No. 264-141

Progress is continuing to fulfill the data gaps from the NAA registration standard. No new data has been completed. We are providing a status report and target dates for completion of pending action:

Toxicology

1. Rabbit Teratology

Work will be initiated soon, and the study is expected to be completed during the second quarter of 1983.

2. Skin Sensitization

The study is completed and undergoing internal review. Due to the protocol deficiencies in not meeting EPA guideline requirements, we are considering the possibility of conducting another study which would be scheduled for completion during second quarter 1983.

3. Acute Inhalation

Based on the results of particle size determinations for technical NAA that showed only 1% of the inhalable particles were less than 10 microns, we request a waiver from data requirement for acute inhalation study. A copy of the data evaluating particle size is appended.

Hydrolysis

The hydrolysis study is almost finished and should be completed by December 1982. We anticipate submission with our next progress report.

Residue

Residue trials have been initiated, and some residue samples are presently being collected for analysis. Data should be available by second quarter 1983.

Please note that to date we still have not received an offer to pay from Greenwood Chemical Company. We did receive a communication that indicates they agreed to share in the cost of data development, but it was not accompanied by the required Offer to Pay.

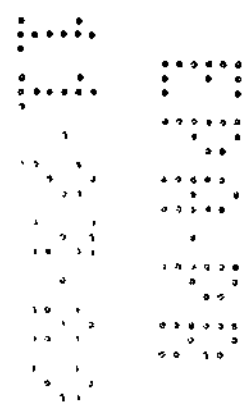
If you have any questions, contact us promptly.

Sincerely,

Warren A. Davis

Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db





INTERNAL CORRESPONDENCE

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.

CEIVED
AUG 31 1982

To (Name)
Division
Location
Floor Number

G. C. Holsing

Date August 27, 1982

From (Name & Dept.) W. N. Casey

R & D

Answering letter date

Copy to

G. G. Madgwick
S. L. Oestreicher
L. J. Helfant

Subject

Carl:

Please find attached the results of our Coulter Counter analysis of a sample of 1-naphthaleneacetic acid (Ref. Orlex Chemicals Corp. Lot No. 010943, and L. J. Helfant, Project Report, File No. 29693). The results show that 1.28% of the particles by weight are smaller than 10 microns; the median particle size of the sample is 26.61 microns. On the attachment the results are given in volume %, which is the same as weight % for a sample of uniform density.

If you have any questions, please feel free to call.

W. N. Casey

DATE: 8/26/82
 SAMPLE: 1-NAPHTHALENEACETIC ACID
 ELECTROLYTE: ISOTON
 DISPERSANT: AL 1491
 EQUIPMENT: TA II
 APERTURES: 140
 OPERATOR: HNC

 CHANNEL # SIZE DIFF
 VOLUME %

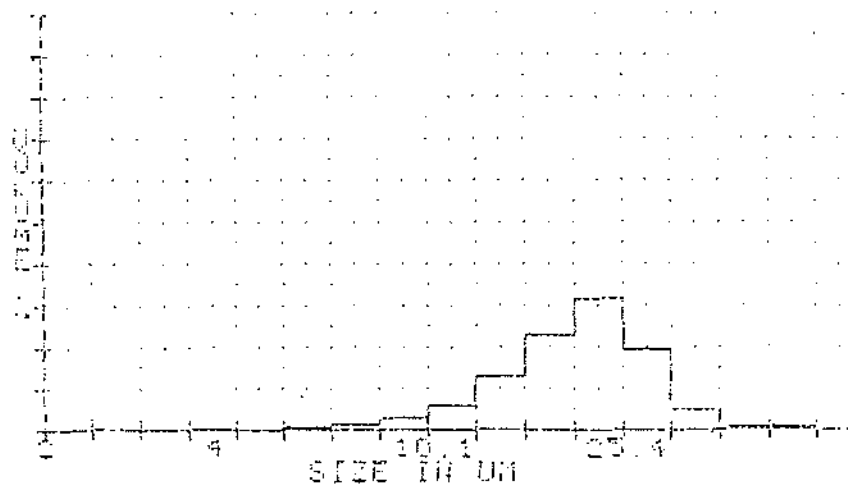
1	2	0
2	2.52	0
3	3.17	0
4	4	0
5	5.04	0
6	6.35	.3
7	8	1
8	10.00	2.5
9	12.7	3.3
10	16	12.3
11	20.16	22.3
12	25.4	31.2
13	32	18.4
14	40.32	4.7
15	50.8	.5
16	64	.5

 DIAMETER VOLUME %

 10 98.72

 DIAMETER VOLUME %

 20.82 75
 26.81 50
 32.82 25





UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

October 21, 1982

EPA Correspondence No. 222-82

Mr. Robert Taylor
Fungicide-Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Taylor:

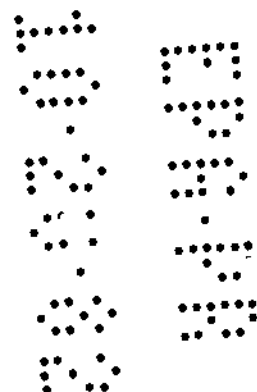
Re: Technical Naphthaleneacetic Acid
EPA Reg. No. 264-372

In accordance with section 3(c) 5(B) of FIFRA, we are submitting five (5) final printed Technical Naphthaleneacetic Acid labels for your records. This submission will complete our registration.

Sincerely,

Karen S. Shearer
Registration Specialist

KSS:db



U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDES PROGRAMS REGISTRATION DIVISION (72-567) WASHINGTON, D.C. 20460	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 2px;">EPA REGISTRATION NO.</td> <td style="width: 50%; padding: 2px;">DATE OF ISSUANCE</td> </tr> <tr> <td colspan="2" style="padding: 2px;">TERM OF ISSUANCE</td> </tr> <tr> <td colspan="2" style="padding: 2px;">NAME OF PESTICIDE PRODUCT</td> </tr> </table>	EPA REGISTRATION NO.	DATE OF ISSUANCE	TERM OF ISSUANCE		NAME OF PESTICIDE PRODUCT	
EPA REGISTRATION NO.	DATE OF ISSUANCE						
TERM OF ISSUANCE							
NAME OF PESTICIDE PRODUCT							
NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> REGISTRATION <input type="checkbox"/> REREGISTRATION (Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)							
NAME AND ADDRESS OF REGISTRANT (Include ZIP code)							
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>							
NOTE: Changes in labeling formula differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above U.S. EPA registration number.							
On the basis of information furnished by the registrant, the above named pesticide is hereby Registered/Reregistered under the Federal Insecticide, Fungicide, and Rodenticide Act.							
A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.							
Registration is in no way to be construed as an indorsement or approval of this product by this Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.							
<div style="border: 1px solid black; width: 100%; height: 100%;"></div>							
<input type="checkbox"/> ATTACHMENT IS APPLICABLE							
SIGNATURE OF APPROVING OFFICIAL	DATE						

TECHNICAL NAPHTHALENEACETIC ACID

A PLANT GROWTH REGULATOR FOR FORMULATING USE ONLY,

ACTIVE INGREDIENT:

1-NAPHTHALENEACETIC ACID MINIMUM 95.0%

INERT INGREDIENTS: MINIMUM 5.0%

KEEP OUT OF REACH OF CHILDREN

DANGER

PRECAUTIONARY STATEMENTS

DANGER. CORROSIVE, CAUSES IRREVERSIBLE EYE DAMAGE, WEAR SAFETY GOGGLES WHEN HANDLING. HARMFUL IF SWALLOWED, AVOID CONTACT WITH SKIN AND EYES,

STATEMENT OF PRACTICAL TREATMENT

IN CASE OF EYE CONTACT FLOOD EYES IMMEDIATELY WITH PLENTY OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION. IF SWALLOWED, CALL A DOCTOR OR POISON CONTROL CENTER, DRINK 1 OR 2 GLASSES OF WATER AND INDUCE VOMITING BY TOUCHING BACK OF THROAT WITH FINGER. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON. IN CASE OF SKIN CONTACT, FLUSH WITH PLENTY OF SOAP AND WATER.

ENVIRONMENTAL HAZARDS

DO NOT DISCHARGE INTO LAKES, STREAMS, PONDS, OR PUBLIC WATERS UNLESS IN ACCORDANCE WITH A NPDES PERMIT. FOR GUIDANCE CONTACT YOUR REGIONAL OFFICE OF THE EPA.

STORAGE AND DISPOSAL

AVOID CONTACT WITH OTHER PESTICIDES, SEEDS, FERTILIZERS OR FEED STUFFS. DO NOT USE IN EQUIPMENT OR IN CONTAINERS IN WHICH YOU HAVE HANDLED OR WILL HANDLE OTHER AGRICULTURAL CHEMICALS UNLESS THOROUGHLY CLEANED.

PESTICIDE, SPRAY MIXTURE, OR RINSE WATER THAT CANNOT BE USED ACCORDING TO LABEL INSTRUCTIONS MUST BE DISPOSED OF ACCORDING TO APPLICABLE FEDERAL, STATE, OR LOCAL PROCEDURES.

COMPLETELY EMPTY LINER BY SHAKING AND TAPPING SIDES AND BOTTOM TO LOOSEN CLINGING PARTICLES, EMPTY RESIDUE INTO EQUIPMENT, THEN DISPOSE OF LINER IN A SANITARY LANDFILL OR BY INCINERATION IF ALLOWED BY STATE AND LOCAL AUTHORITIES. IF DRUM CANNOT BE REUSED, DISPOSE OF IN THE SAME MANNER.

INSTRUCTIONS FOR FORMULATION

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

THIS PESTICIDE MAY BE USED ONLY FOR THE FORMULATION OF A PLANT GROWTH REGULATOR. FORMULATORS USING THIS PRODUCT ARE RESPONSIBLE FOR OBTAINING EPA REGISTRATIONS FOR THEIR FORMULATED PRODUCTS.

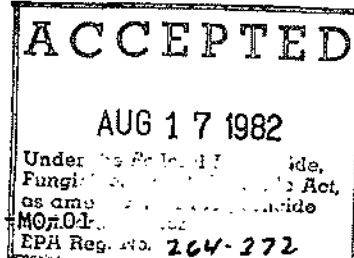
DISTRIBUTED BY:

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.
P.O. BOX 12014, T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

EPA REG. NO. 264-372

EPA EST. NO. 264-

NET CONTENTS





UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

1919) 549-2000

August 10, 1982

EPA Correspondence No. 161-82

Mr. Robert Taylor (PM 25)
Fungicide-Herbicide Branch
Registration Division (TS 767C)
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Taylor:

Re: Technical Naphthaleneacetic Acid
EPA Reg. No. 264-372

As requested in your letter dated July 27, 1982, we have amended the Technical Naphthaleneacetic Acid label with the following revisions:

1. Changed the name appearing on label to "Technical Naphthaleneacetic Acid".
2. Revised the chemical name in the ingredient statement to "1-naphthaleneacetic acid".
3. Modified the statement "For use in the manufacture of plant growth regulators" to read "A plant growth regulator for formulating use only".
4. Positioned the "DANGER" signal word below the "Keep out of reach of children" statement.
5. Revised the Hazard to Humans and Domestic Animals paragraph to read as requested.
6. Appended Environmental Hazards and Instructions for Formulation paragraphs.
7. Deleted the "For manufacturing of plant growth regulators only" statement.
8. Added the assigned EPA Reg. No. 264-372.

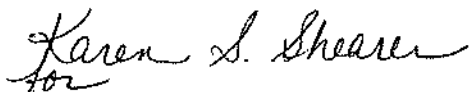
Mr. Robert Taylor
EPA Correspondence No. 161-82
August 10, 1982
Page 2

We agree to submit or cite all data required for registration of our product under Section 3(c)(5) of FIFRA 1978 when the Environmental Protection Agency requires all registrants to submit such data.

In view of the fact that the acute inhalation study was unacceptable to support registration of our NAA technical products, we are presently conducting particle size determinations of our Naphthaleneacetic acid technical. If the inhalable particle sizes are aerodynamic diameters of 15 micrometers or less, another inhalation study will be performed according to Section 163.81-3 of the proposed guidelines.

We are completing this submission with five (5) label copies suitable for your stamped approval based upon the conditions in the recent PR Notice 82-2 stating that final printed labels will no longer be a prerequisite to registration. We realize that five (5) final printed labels must be submitted before the product can be released for shipment.

Sincerely,



for
Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db

III 27 1987

Union Carbide Agricultural
Products Company, Inc.
P.O. Box 12014
T. W. Alexander Drive
Research Triangle Park, NC 27709

Attention: W. A. Davis

Gentlemen:

Subject: Technical Naphthalene Acetic Acid
EPA File Symbol 264-GTE

The product referred to above will be acceptable for registration as provided for under Section 3(c)(7)(A) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, provided that you:

1. Agree in writing that you will submit and/or cite all data required for registration/reregistration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

If these conditions are not complied with after the registration is issued, the registration will be subject to cancellation in accordance with Section 6(a) of the Act.

2. Submit your final printed labeling, incorporating the following revisions, within 75 days. (If finished labeling cannot be furnished within the 75-day period, an extension should be requested.)

- a. Revise the statement "For use in the manufacture of plant growth regulators" to read:

A plant growth regulator for formulating
use only.

- b. The proposed product name "Technical Naphthalene Acetic Acid" should appear on the label rather than the name now appearing on the label.

- c. The chemical name appearing in the ingredients statement should be listed as follows:

1-Naphthaleneacetic acid

- d. The statement "Keep out of reach of children" must precede the signal word "Danger."
- e. Revise the "Hazard to Humans and Domestic Animals" statements to read as follows:

Danger

Corrosive, causes irreversible eye damage.
Wear safety goggles when handling. Harmful if
swallowed. Avoid contact with skin and eyes.

- f. Add an "Environmental Hazards" heading and statements to your label. This information should follow the "Statement of Practical Treatment" paragraph. The environmental hazards should read as follows:

Environmental Hazards

Do not discharge into lakes, streams, ponds, or
public waters unless in accordance with an NPDES
permit. For guidance contact your regional office
of the EPA.

- g. Following the "Storage and Disposal" statements, add the following:

Instructions for Formulation

It is a violation of Federal law to use this
product in a manner inconsistent with its labeling.

This pesticide may be used only for the
formulation of a plant growth regulator.
Formulators using this product are responsible for
obtaining EPA registrations for their formulated
products.

- h. The statement "It is a violation of Federal law ... inconsistent with its labeling" that appears below the ingredient statement should be deleted. The statement "For Manufacturing of Plant Growth Regulators Only" can also be deleted.

The submitted acute inhalation study is not acceptable to support registration or reregistration of this product. In an acute inhalation study, actual concentrations must be used (mg/l units is the preferable way of expression), equal number of male and female animals must be used, and individual necropsy reports and symptomatology reports for each animal must be submitted. A new study will have to be supplied to support the registration/reregistration of this product.

Please note that Accession No. 243372 was assigned to the data provided with this application.

"EPA Registration No. 264-372" is being reserved for this product. This must appear on the finished label. The "Notice of Registration" will be issued when five (5) acceptable finished labels are submitted as provided in 40 CFR Section 162.10(a)(6) (40 FR 28278, July 3, 1975). Refer to the A-79 Enclosure for a further description of finished labeling.

This letter does not constitute registration and the product may not be lawfully marketed until it is registered.

Sincerely yours,

Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

Enclosure

TS-767C:RTAYLOR:DCR-08337:WANG-0247B:CBP:Raven:479-2013: 7/26/82

SUBMISSION REVIEW RECORD				1. REGISTRATION NUMBER				CYCLE	2. DATE RECEIVED		
G				264-GTE					MO	DAY	YR
3. 3CID PUBLICATION NECESSARY				4. PETITION NO.				5. RECEIVED PM TEAM			
<input type="checkbox"/> YES <input type="checkbox"/> NO								MO DAY YR 05 27 82			
6. METHOD OF SUPPORT				7. PRODUCT MANAGER				NO.	8. PROJECTED RETURN		
<input type="checkbox"/> 2A <input type="checkbox"/> 2B <input type="checkbox"/> 2C				TAYLOR				25	MO DAY YR 05 27 82		
9. DATE PULLED		10. DATE PUBLISHED		11. ACTION TYPE				CODE	12. OUTGOING DATE		
								160	MO DAY YR 05 27 82		
REV. SKD.	REVIEW TYPE CODE	REVIEW TYPE	REVIEWER CODE (Initials)	SIGNATURE OF REVIEWER				COM-MENT CODE	DATE REVIEW COMPLETED		
									MO	DAY	YR
	A	REVIEWABILITY TEAM									
	B	PRODUCT MANAGER TEAM EFFICACY REVIEW									
	C	PRODUCT MANAGER TEAM HUMAN SAFETY REVIEW									
	D	PRODUCT MANAGER TEAM ENVIRONMENTAL SAFETY REVIEW									
	E	PRODUCT MANAGER TEAM RESUBMISSION REVIEW									
	F	PRODUCT MANAGER									
	G	INTERAGENCY REFERRAL									
	H	COST-BENEFIT REVIEW									
	I	PUBLIC COMMENTS REVIEW									
	J	EEC BRANCH INSECTICIDE EFFICACY									
	K	EEC BRANCH HERBICIDE EFFICACY									
	L	EEC BRANCH FUNGICIDE EFFICACY									
	M	EEC BRANCH RODENTICIDE EFFICACY									
	N	EEC BRANCH DISINFECTANT EFFICACY									
	O	CHEMISTRY BRANCH RESIDUE CHEMISTRY									
	P	EEC BRANCH ENVIRONMENTAL CHEMISTRY									
	Q	TOXICOLOGY BRANCH HUMAN SAFETY									
	R	EEC BRANCH ENVIRONMENTAL SAFETY									
X	S	PL	0144	Johanna F. Graham				PL	07	08	82
	T										
PRODUCT MANAGER SIGNATURE				TYPE OF RESPONSE				CODE			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

DATE: July 8, 1982

SUBJECT: EPA File Symbol: 264-GTE
Technical Naphthalene Acetic acid

FROM: Deloris F. Graham *DFG 7/20/82*
FHB/TSS *E 7/20/82*

TO: Robert Taylor
Product Manager (25)

Applicant: Union Carbide Agricultural Products Company
P.O. Box 12014, T.W. Alexander Drive
Research Triangle Park, NC 27709

Active Ingredient:

1-Naphthyl Acetic Acid 95.0%
Inert Ingredient 5.0%

Background: Submitted Acute Oral, Acute Dermal, Acute Inhalation, Eye Irritation and Primary Dermal Irritation Studies. Studies conducted by Union Carbide, MB Research Laboratories and Pharmakon Research International. Data under accession number 247577. Method of support not indicated.

Recommendation:

(1) FHB/TSS finds the Acute Oral, Acute Dermal, Eye Irritation and Primary Dermal Irritation Studies are acceptable to support conditional registration of this product.

(2) The Acute Inhalation Study is Core Supplementary Data and unacceptable to support conditional registration of this product. In the Acute Inhalation Study actual concentrations must be submitted; equal number of male and female animals must be used; individual necropsy reports and symptomatology reports for each animal must be submitted.

(3) The appropriate signal word is DANGER.

Label:

(1) The precautionary statements must be revised to include "Corrosive, causes irreversible eye damage."

(2) The statement "Keep out of reach of children" must precede signal word.

Review:

(1) Acute Oral Toxicity Study: Pharmakon Research International; PH 402-UC-001-82; April 29, 1982.

Procedure: 5 groups consisting of 5M and 5F each received one of the following doses: 1750, 2250, 3000, 3500, and 4000 mg/kg. Observations made daily for 14 days. Necropsy performed on all animals.

Results: At 1750 mg/kg, 1/5 M and 3/5 F died; at 2250 mg/kg, 1/5 M and 2/5 F; at 3000 mg/kg, 3/5 M and 4/5 F; at 3500 mg/kg, 5/5 M and 4/5 died; at 4000 mg/kg, 5/5 M and 5/5 F died. Signs of toxicity observed included convulsions, piloeriction, abnormal gait, twitches, abnormal stance, decreased activity and body tone; arched back, puestration, salivation, ptosis, tremors, hypersensitivity to touch, red exudate in nasal area, ataxia, body drop, straub tail and brown discoloration of genital and anal area. Necropsy revealed red adrenals; stomach and intestines filled and distended, hemorrhages and white foci present on the lungs. LD50 for males and females was determined to be 2520 mg/kg with 95% confidence limits between 2100 and 3024 mg/kg.

Study Classification: Core Guideline Data

Toxicity Category: III CAUTION

(2) Acute Dermal Toxicity Study: Pharmakon Research International, Inc; PH 422-UC-001-82; May 11, 1982.

Procedure: 5 M & 5 F rabbits recieved 2 g/kg of the test material at abraded skin under occlusive wrap for 24 hour exposure. Observations were made at 2 and 4 hours after 24 hour exposure period and twice daily thereafter for 14 days. Necropsy performed on all animals.

Results: 1/10 animals died on day 11. No sign of toxicity observed. No visible lesions in the one animal that died during the study. At termination of study, necropsy revealed fluid-filled intestines and stomach distention in one rabbit. No other lesions observed. LD50 greater than 2 g/kg.

Study Classification: Core Guideline Data

Toxicity Category: III-CAUTION

(3) Acute Inhalation Toxicity Study: MB Research Lab., Inc.; Project # MB 75-849; August 13, 1975

Procedure: Ten male Wistar rats were exposed to a nominal concentration of 20,000 ppm in a 51-liter closed chamber for one hour. Observations made for 14 days after exposure.

Results: No mortalities. No signs of toxicity.

Study Classification: Core Supplementary Data. An equal number of male and female animals must be used. Actual concentrations must be used and mg/l units is the preferable way of expression. Individual symptomatology and necropsy reports must be submitted.

(4) Primary Eye Irritation Study: Union Carbide; Project Report 45-51; April 27, 1982.

Procedure: Nine rabbits recieved 100 mg of the test material in one eye each. The treated eyes of the three of the rabbits were washed 20 to 50 seconds after treatment. Observations made at 1, 2, 3, 4, 7, 10, 14 and 21 days after treatment.

Results: At 24 hours, 6/6 animals of the unwashed group and 3/3 of the washed group had corneal opacity ((1/6=10, 1/6=20, 1/6=30, 3/6=40)(1/3=5, 1/3=20, 1/3=40); 6/6 and 1/3 iris irritation (6/6=5) (1/3=2); 6/6 and 3/3 had redness (5/6=2, 1/6=3) (2/3=1, 1/3=2), chemosis (5/6=1, 1/6=2) (3/3=1) and discharge (3/6=2, 3/6=3) (2/3=1, 1/3=2).

At 7 days, 5/6 and 1/3 corneal opacity(3/6=5, 2/6=10) (1/3=10); 2/6 iris irritation (2/6=5); 4/6 redness (4/6=1); 1/6 chemosis (1/6=1); 3/6 discharge (2/6=1, 1/6=2).

At 14 days, 2/6 and 1/3 corneal opacity (1/6=5, 1/6=80) (1/3=5); 1/6 iris irritation (1/6=5); 1/6 and 1/3 redness (1/6=2), chemosis 1/6=2) and discharge (1/6=3).

At 21 days, 1/6 and 1/3 corneal opacity (1/6=80) (13=5); 1/6 iris irritation (1/6=5); 1/6 an 1/3 redness (1/6=2) (1/3=1); 1/6 chemosis (1/6=2); and 1/6 and 1/3 discharge (1/6=3) (1/3=1).

Lids closed at 24 and 48 hours. Vascularization at 7 days. Pteryguim at 10 days.

Study Classification: Core Guideline Data.

Toxicity Category: I-DANGER

(5) Primary Skin Irritation Study: Union Carbide; Project Report 45-51; April 27, 1982.

Procedure: Six rabbits received 500 mg of the test material at 2 abraded and 2 intact skin sites per animal under occlusive wrap for 24-hour exposure. Observations were made at 24 and 72 hours after treatment.

Results: No irritation present at 24 or 72 hours.

Study Classification: Core Guideline Data.

Toxicity Category: IV-CAUTION



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, T. W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

July 13, 1982

EPA Correspondence No. 141-82

Mr. Dan Dixon
Registration Division (TS 767)
Fungicide-Herbicide Branch
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Dixon:

Re: Technical 1-Naphthyl Acetic Acid

Based upon our conversations pertaining to the pending technical label for 1-Naphthyl Acetic Acid, we are now submitting a new offer to pay employing the "cite all" method of support. We have also modified each confidential statement of formula to specifically show [REDACTED] as the source for our technical chemical.

We are becoming quite anxious about the pending approval of the technical label for 1-Naphthyl Acetic Acid. There are many formulators that are totally dependent upon timely approval to insure they are able to sell during the 1983 season.

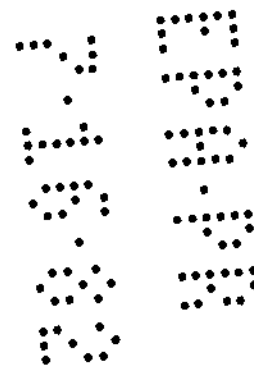
Sincerely,

A handwritten signature in cursive script that reads "Warren A. Davis".

Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db

Enclosure





U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDES PROGRAM (TS-767)
WASHINGTON, D.C. 20460

OFFER TO PAY STATEMENT
Cite- All Method of Compensation

(Please read instructions on reverse before completing.)

Form Approved OMB No. 2000-0012

1. DATE

7/13/82

2. EPA REGISTRATION NO./FILE SYMBOL

264

3. PRODUCT MANAGER

R. Taylor

4. NAME AND ADDRESS OF APPLICANT (Write or print within the corner marks; include zip code.)

Union Carbide Agricultural Products Co., Inc.
P. O. Box 12014, T. W. Alexander Drive
Research Triangle Park, NC 27709

5. PRODUCT NAME

Technical 1-Naphthyl Acetic Acid

This is an Offer to Pay Compensation under 40 CFR 162.9-4 and -5 in connection with an Application for Registration.

Applicant offers and agrees to pay compensation to other persons with regard to the approval of this application, to the extent required by Sections 3(c)(1)(D) and 3(c)(2)(D) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (FIFRA).

Applicant acknowledges that for purposes of FIFRA 3(c)(1)(D) this application, and any resulting registration, relies on the following data:

1. Any data submitted or specifically cited by the applicant; and
2. Each other item of data in the Agency's files which:
 - a. Concerns the properties or effects of:
 - (1) Applicant's product;
 - (2) A product identical or substantially similar in composition to applicant's product; or
 - (3) One or more of the active ingredients of applicant's product for which EPA has not published a final generic standard; and
 - b. Is one of the types of data that EPA would require to be submitted for scientific review if the application sought the initial registration under FIFRA Section 3(c)(5) of a product with composition and uses identical or substantially similar to those of the applicant's product, under the data requirements in effect on the date EPA approves applicant's present application.

7.

- ☒ I have notified the appropriate companies and attached the Certification Statement, in the original submission dated 5/27/82
- ☐ The Certification Statement will be submitted prior to registration.

8. NAME OF APPROVING OFFICIAL

Warren A. Davis

9. TITLE

Registration Manager
Herbicides/Growth Regulators

10. SIGNATURE OF APPROVING OFFICIAL

Warren A. Davis

11. DATE SIGNED

7/13/82

12. DATE APPLICATION
RECEIVED (EPA use only -
stamp)



UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, Inc.
P. O. BOX 12014, 7 W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, N. C. 27709

*Accession
247577*

May 27, 1982

EPA Correspondence No. 110-82

Mr. Robert Taylor (PM 25)/
Registration Division (TS 767)
Fungicide-Herbicide Branch
Office of Pesticide Programs
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Taylor:

Re: Request for New Technical Label
Naphthalene Acetic Acid

In order for Union Carbide Agricultural Products Co., Inc. to offer a concentrated manufacturing base for sale to custom formulators, EPA requires that we register a technical label for Naphthalene Acetic Acid. Considerable progress has already been made toward this goal when we secured approval of [REDACTED] as the new source of supply for our formulated NAA containing products. The supporting chemistry data for Naphthalene Acetic Acid was submitted, reviewed and approved by EPA under accession number 246499. These data are not being resubmitted at this time since no changes in chemical content have been made. A copy of the February 10, 1982 EPA notice of approval is appended to confirm our current source of technical Naphthalene Acetic Acid meets the EPA requirements for registration. We simply plan to offer for sale the [REDACTED] produced NAA with a label statement that reads "Distributed by Union Carbide Agricultural Products Co., Inc."

To support our registration request we are enclosing a series of acute toxicity studies for Naphthalene Acetic Acid that characterize the handling precautions for its safe use. These studies include the acute oral, dermal, eye, and inhalation toxicity. If needed, additional data including fish and wildlife studies, are currently on file in Union Carbide's response to the pending registration standard.

20-20-9

84-843

Mr. Robert Taylor
EPA Correspondence No. 110-82
May 27, 1982
Page 2

To complete our submission we are enclosing the following information:

1. Application for new registration
2. Offer to pay and cite-all method of support*
3. Certification statement
4. Confidential statement of formula (previously filed with EPA accession number 246499)
5. Five copies of final labels
6. Data submission listing
7. Label technical data sheet

*Note: No offers to pay were actually sent since Union Carbide Agricultural Products Co., Inc. is the only registrant and data submitter listed in the September 25, 1981 EPA Index.

This requested technical label is critical to both Union Carbide Agricultural Products Co., Inc. and a considerable number of dependent formulators. To data we are the only company that has agreed to meet the requirements of the registration standard, and as such we believe we will be the only company in a position to offer a registered technical chemical to formulators. Delays in securing the registered technical labels could result in shortages for most of the NAA formulated products used for sprout inhibition, fruit stop drop and rooting aids. Our goal is to secure approval no later than August 15, 1982 to permit customers ample time to formulate, package and distribute their products for the 1983 season. Approval in a timely manner is important. We appreciate your attention and assistance on this registration request.

Sincerely,



Warren A. Davis
Registration Manager
Herbicides/Growth Regulators

WAD:db

Enclosures

20-10-9

84-843

TECHNICAL

NAPTHYL ACETIC ACID

FOR USE IN THE MANUFACTURE OF PLANT GROWTH REGULATORS

ACTIVE INGREDIENT:

1- NAPTHYL ACETIC ACID,..... MINIMUM 95.0%

INERT INGREDIENTS: MINIMUM 5.0%

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT
IN A MANNER INCONSISTENT WITH ITS LABELING.

DANGER

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS

HAZARD TO HUMANS & DOMESTIC ANIMALS
HARMFUL IF SWALLOWED. MAY CAUSE EYE DAMAGE, WEAR SAFETY
GOGGLES WHEN HANDLING. AVOID CONTACT WITH SKIN AND EYES.

STATEMENT OF PRACTICAL TREATMENT

IN CASE OF EYE CONTACT FLOOD EYES IMMEDIATELY WITH PLENTY
OF WATER FOR AT LEAST 15 MINUTES AND GET MEDICAL ATTENTION.
IF SWALLOWED, CALL A DOCTOR OR POISON CONTROL CENTER. DRINK
1 OR 2 GLASSES OF WATER AND INDUCE VOMITING BY TOUCHING BACK
OF THROAT WITH FINGER. DO NOT INDUCE VOMITING OR GIVE ANYTHING
BY MOUTH TO AN UNCONSCIOUS PERSON. IN CASE OF SKIN CONTACT,
FLUSH WITH PLENTY OF SOAP AND WATER

STORAGE AND DISPOSAL

AVOID CONTACT WITH OTHER PESTICIDES, SEEDS, FERTILIZERS OR
FEED STUFFS. DO NOT USE IN EQUIPMENT OR IN CONTAINERS IN
WHICH YOU HAVE HANDLED OR WILL HANDLE OTHER AGRICULTURAL
CHEMICALS UNLESS THOROUGHLY CLEANED.

PESTICIDE, SPRAY MIXTURE, OR RINSE WATER THAT CANNOT BE USED
ACCORDING TO LABEL INSTRUCTIONS MUST BE DISPOSED OF ACCORDING
TO APPLICABLE FEDERAL, STATE, OR LOCAL PROCEDURES.

COMPLETELY EMPTY LINER BY SHAKING AND TAPPING SIDES AND
BOTTOM TO LOOSEN CLINGING PARTICLES. EMPTY RESIDUE INTO
EQUIPMENT. THEN DISPOSE OF LINER IN A SANITARY LANDFILL OR
BY INCINERATION IF ALLOWED BY STATE AND LOCAL AUTHORITIES.
IF DRUM CANNOT BE REUSED, DISPOSE OF IN THE SAME MANNER.

FOR MANUFACTURING OF PLANT GROWTH REGULATORS ONLY.

NET CONTENTS

DISTRIBUTED BY:

UNION CARBIDE AGRICULTURAL PRODUCTS COMPANY, INC.
P.O. Box 12014, T.W. Alexander Drive, Research Triangle Park, NC 27709

EPA REG. NO. 264-

EPA EST. 264-MO-1

2045

44-443

OFFER TO PAY STATEMENT ---- COMBINED CITE-ALL AND ALTERNATE METHODS OF SUPPORT

EPA File Symbol/Registration Number 264 Date of Application May 27, 1982

Product Name Technical Naphthalene Acetic Acid

Applicant's Name and Address Union Carbide Agricultural Products Company, Inc.

P. O. Box 12014, T. W. Alexander Drive

Research Triangle Park, NC 27709

THIS IS AN OFFER TO PAY COMPENSATION UNDER 40 CFR 162.9-8 IN CONNECTION WITH REGISTRATION OF AN END-USE PRODUCT WHICH WILL CONTAIN ONE OR MORE ACTIVE INGREDIENT(S) DERIVED FROM 1) AN UNREGISTERED PRODUCT OR 2) A REGISTERED PRODUCT THAT IS NOT PURCHASED FROM ANOTHER PRODUCER.

Applicant offers and agrees to pay compensation to other persons with regard to the approval of this application to the extent required by Sections 3(c)(1)(D) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (FIFRA).

Applicant acknowledges that for the purposes of FIFRA Section 3(c)(1)(D), this application relies on, and the Agency shall consider only, the following data:

1. Data submitted by the applicant and conducted using the applicant's formulated product or another product of identical composition. Data already in Agency files which were conducted with a product of identical composition may be cited instead of submitted. (INCLUDE WITH YOUR APPLICATION THE DATA SUBMISSION LISTING.)
2. Existing tolerances, food additive regulations, exemptions, and other clearances issued under the Federal Food, Drug, and Cosmetic Act;
3. With respect to those active ingredients which are derived from registered and purchased products, other data pertaining to the safety of the active ingredient, rather than to the safety of the end-use product (however, under FIFRA 3(c)(2)(D), no compensation is payable for such data); and
4. With respect to those active ingredients which are not derived from registered and purchased products, each item of data in the Agency's files which concerns the properties or effects of any such active ingredient and is one of the types of data that EPA would require to be submitted for scientific review if the applicant sought the initial registration under FIFRA Section 3(c)(5) of a product with composition and intended uses identical to those proposed for the applicant's product, under the data requirements in effect on the date EPA approves the applicant's present application.

The following active ingredients in this product are derived from unregistered products or products that are registered but not purchased from another producer:

☒ *I have notified the appropriate companies and attached the Certification Statement.

☐ The Certification Statement will be submitted prior to registration.

Signature and Title Warren A. Davis Registration Manager
Herbicides/Growth Regulators

Typled Name Warren A. Davis Date signed May 27, 1982 322

*No offers to pay compensation were actually sent since Union Carbide Agricultural

CERTIFICATION STATEMENT

EPA File Symbol/Reg. No. 264 Date of application to which May 27, 1982
this statement applies

Product Name Technical Naphthalene Acetic Acid

Applicant's Name and Address Union Carbide Agricultural Products Company, Inc.
P. O. Box 12014, T. W. Alexander Drive
Research Triangle Park, NC 27709

I certify that I have notified in writing the companies who have submitted data upon which I have relied to support my application and offered to:

1. Pay compensation for those data in accordance with Sections 3(c)(1)(D) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act, as amended; and
2. Commence negotiations to determine which data are subject to the compensation requirements of FIFRA, and the amount and terms of compensation, if any, due.

The companies I have notified are:

- ☒ All companies listed on the Pesticide Data Submitters List for all active ingredients contained in my product (see 40 CFR 162.9-5).
EPA Index of Data Submitters dated 9/25/81*
- ☐ All companies listed on the Pesticide Data Submitters List for all active ingredients contained in my product which are not derived from registered and purchased sources (see 40 CFR 162.9-8(f)).
- ☐ Those companies who have conducted the studies which I have submitted (or cited if conducted with an identical product) (see 40 CFR 162.9-8(e)).

*No offers to pay compensation were actually sent since Union Carbide Agricultural Products Company, Inc. was the only registrant listed in the EPA Index.

Signature and Title Warren A. Davis Registration Manager
Herbicides/Growth Regulators

Typed signature Warren A. Davis Date signed May 26, 1982

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Union Carbide Agricultural
Products Company, Inc.
P.O. Box 12014
T.W. Alexander Drive
Research Triangle Park, NC 27709

OFFICE OF
PESTICIDES AND TOXIC SUBSTANCES

FEB 10 1982

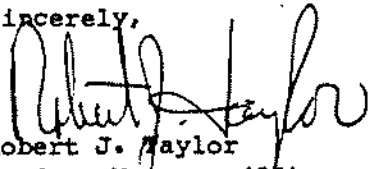
Attention: Warren A. Davis

Gentlemen:

Subject: Rootone F
EPA Registration No. 264-29
Amid-Thin W
EPA Registration No. 264-137
Fruitone N
EPA Registration No. 264-141
NAA 800
EPA Registration No. 264-142
Tre-Hold Aerosol
EPA Registration No. 264-248
Tre-Hold Sprout Inhibitor All2
EPA Registration No. 264-336
Alternate Sources of NAA
Your Submissions of July 30, 1981, December 16, 1981,
and February 2, 1982

The review of your request to use alternate sources of active ingredient has been completed. The use of the [REDACTED] products and the use of the [REDACTED] EPA-registered products are acceptable. The information submitted has been noted (Accession No. 246499) and will be made a part of the records for these products.

Sincerely,


Robert J. Taylor
Product Manager (25)
Fungicide-Herbicide Branch
Registration Division (TS-767C)

RECEIVED
FEB 16 1982

20.20.9

04.04.3

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDES PROGRAM (WH-567) WASHINGTON, D.C. 20460		1. REFERENCE CODE	2. EPA USE ONLY				
APPLICATION FOR NEW PESTICIDE PRODUCT REGISTRATION (Please read instructions on reverse before completing)		3. COMPANY/PRODUCT NO. 264 - GTE	4. PROPOSED CLASSIFICATION <input checked="" type="checkbox"/> GENERAL <input type="checkbox"/> RESTRICTED				
5. NAME AND ADDRESS OF APPLICANT (Include ZIP Code) Union Carbide Agricultural Products Company, Inc. P. O. Box 12014, T. W. Alexander Drive Research Triangle Park, NC 27709 Attn: W. A. Davis		6. TYPE OF CONTAINER <input type="checkbox"/> METAL <input type="checkbox"/> PLASTIC <input type="checkbox"/> GLASS <input checked="" type="checkbox"/> PAPER <input type="checkbox"/> OTHER (Specify)					
<input type="checkbox"/> CHECK IF THIS IS A NEW ADDRESS		7. WILL CHILD RESISTANT PACKAGING BE USED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
8. PRODUCT NAME Technical Naphthalene Acetic Acid		9. EXPERIMENTAL PERMIT NO. N/A					
10. LOCATION OF LABEL DIRECTIONS <input checked="" type="checkbox"/> ON LABEL <input type="checkbox"/> ON MATERIAL ACCOMPANYING PRODUCT		11. MANNER IN WHICH LABEL IS AFFIXED TO PRODUCT <input type="checkbox"/> LITHOGRAPH <input type="checkbox"/> OTHER (Specify) <input checked="" type="checkbox"/> PAPER GLUED <input type="checkbox"/> STENCILED					
12. TYPES OF DATA SUBMITTED		FOR EPA USE ONLY					
01. NONE		1201					
02. PRODUCT CHEMISTRY Referenced		1202					
03. RESIDUE CHEMISTRY		1203					
04. ENVIRONMENTAL CHEMISTRY		1204					
05. EFFICACY		1205					
06. PHYTOTOXICITY		1206					
<input checked="" type="checkbox"/> 07. HUMAN SAFETY Acute Toxicity		1207	2	4	7	5	7
08. DOMESTIC ANIMAL SAFETY		1208					
09. FISH AND WILDLIFE SAFETY Referenced		1209					
10. BENEFICIAL INSECT SAFETY		1210					
11. ACCIDENT EXPOSURE EXPERIENCE		1211					
12. OTHER (Specify)		1212					
13. OTHER (Specify)		1213					
13. METHOD OF SUPPORT (See instructions) <input type="checkbox"/> Required Supporting Data Attached. (2A) <input type="checkbox"/> Required Supporting Data Submitted by Referencer. (2B) <input type="checkbox"/> Proceed on the Basis of Established Use Patterns. (2C)		14. CONTACT POINT Complete items directly below for identification of individual to be contacted, if necessary, to process this application.		15. DATE APPLICATION RECEIVED (Stamped)			
OFFER TO PAY STATEMENT I hereby offer to pay reasonable compensation to the extent provided under Section 3 (c)(1)(D) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, and in accordance with the Regulations and Guidelines published thereunder for use of any test data which has been submitted to the U.S. Environmental Protection Agency in connection with an application for the registration of a pesticide for the first time on or after October 21, 1972 and which may be used in support of the registration application for the subject pesticide.		NAME Warren A. Davis					
		TITLE Registration Manager Herbicides/Growth Regulators					
		TELEPHONE NO. (Include Area Code) (919) 549-2379					
16. SIGNATURE Warren A. Davis		17. DATE Registration Manager					
18. TYPED NAME Warren A. Davis		19. DATE SIGNED May 27, 1982					

U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF PESTICIDE PROGRAMS (WH-567) WASHINGTON, D.C. 20488		1. COMPANY/REGISTRATION NO. 264 - GTE	2. EPA USE ONLY - - -
LABEL TECHNICAL DATA (See INSTRUCTIONS on back of label part)		3. PRODUCT NAME F Technical Naphthalene Acetic Acid	
4. APPLICATION SITES (Check all that apply)		5. PEST TYPE (Check all that apply)	
01 CROPS (Fruit) 02 CROPS (Vegetable) 03 CROPS (Field) 04 CROPS (Spice) 05 CROPS (Nut) 06 CROPS (Other) 10 SOIL TREATMENT (No crop specified) 20 FOREST 30 ORNAMENTALS 40 TURF 50 STORED PRODUCTS TREATMENT 61 ANIMALS (Livestock) 62 ANIMALS (Dairy) 63 ANIMALS (Pet) 64 ANIMALS (Laboratory) 65 ANIMALS (Other) 71 OUTDOOR (Nocrop Agricultural) 72 OUTDOOR (Resident/Commercial) 73 OUTDOOR (Non agricultural) 81 BUILDINGS (Agricultural) 82 BUILDINGS (Commercial) 83 BUILDINGS (Food Processing) 84 BUILDINGS (Medical) 85 BUILDINGS (Residential) 91 EQUIPMENT (Commercial) 92 EQUIPMENT (Food) 93 EQUIPMENT (Agricultural) 94 EQUIPMENT (Medical) 95 EQUIPMENT (Transportation) 96 LAUNDRY AND DRY CLEANING 97 INDUSTRIAL PRESERVATIVES 98 PESTICIDE (Manufacturing only) 99 OTHER (Specify)		01 ALGAE 02 AMPHIBIAN/REPTILE 03 BACTERIA 04 BIRDS 05 FISH 06 FOULING ORGANISMS 07 FUNGI 08 INSECTS AND MITES 09 MAMMALS 10 NEMATODES 11 PLANTS 12 RODENTS 13 SLIME 14 SLUGS AND SNAILS 15 VIRUS 16 OTHER (Specify) X Plant Regulator	
6. MODE OF ACTION (Check all that apply)		7. USER TYPE (Check all that apply)	
01 ATTRACTANT 02 BIOLOGICAL CONTROL 03 CNEODSTERILANT 04 DEFOLIANT 05 DESICCANT 06 FEEDING DEPRESSANT 07 GROWTH INHIBITOR 08 GROWTH REGULATOR 09 POISON (Single dose) 10 POISON (Multiple Dose) 11 PRESERVATIVE 12 REPELLENT 13 OTHER (Specify)		01 UNSPECIFIED GENERAL USE 02 UNSPECIFIED RESTRICTED USE 03 HOMEOWNER USE 04 JANITORIAL USE 05 PEST CONTROL OPERATOR USE 06 COMMERCIAL APPLICATOR USE 07 FARMER USE 08 MEDICAL USE 09 VETERINARY USE 10 GOVERNMENT AGENCY USE X 11 MANUFACTURING USE	
X For manufacturing of Plant Growth Regulators		8. FORMULATION (Check one only)	
		01 TECHNICAL CHEMICAL 02 FORMULATION INTERMEDIATE 03 DUST 04 GRANULAR 05 PELLETTED/TABLETTED 06 WETTABLE POWDER 07 WETTABLE POWDER/DUST 08 CRYSTALLINE 09 MICROENCAPSULATED 10 IMPREGNATED MATERIALS 11 SELF-GENERATING SMOKE 12 EMULSIFIABLE CONCENTRATE 13 INVERT EMULSION 14 FLOWABLE CONCENTRATE 15 SOLUBLE CONCENTRATE 16 SOLUTION (Ready to Use) 17 OILS (No added pesticide) 18 PRESSURIZED (Gas) 19 PRESSURIZED (Liquid) 20 PRESSURIZED (Dust) 21 OTHER (Specify)	

REMARKS:

20 20 9

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